



Volkswagen Trust

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Missouri Volkswagen Trust

**Compilation of Public Comments
Draft Beneficiary Mitigation Plan
Draft Implementation Guidelines**

Missouri Department of Natural Resources

May 15, 2018

Comments Received via Email or Postal Mail



Submitted as an attachment via dnr.mo.gov/env/apcp/vw/vwcommentform.htm

May 7, 2018

Carol S. Comer, Director
Missouri Department of Natural Resources
P.O. Box 176
Jefferson City, MO 65102

Re: BYD Comments on Missouri's Use of Volkswagen Settlement Funds

Dear Director Comer:

BYD America ("BYD") appreciates the opportunity to submit the following comments that align with and build upon Missouri's goals to achieve broad, multi-sector deployments of zero-emission vehicles. Such deployments will take advantage of the Volkswagen settlement's unprecedented opportunity to reduce mobile source emissions and, in particular, provide both near- and long-term nitrogen oxide (NOx) emissions reductions in areas that bear a disproportionate share of the state's air pollution burden.

BYD is encouraged by the Department of Natural Resources' allocation of \$4 million to transit bus projects. However, given Missouri's overall \$41 million pot, there is significant room to increase such an allocation. BYD thus urges the state to further prioritize transit bus projects, as these vehicles' unique combination of high annual mileage, diverse ridership in urban and rural settings, and advanced commercially-available technology make them a wise investment for the state while offering the broadest suite of benefits to riders and all Missourians.

BYD would like to take this opportunity to provide additional information on the availability of all-electric medium and heavy-duty buses. Our recommendations for Missouri fall into three categories:

- Maximize the cost-effectiveness and cost of ownership benefits by ensuring that a greater share of Missouri's \$41 million allocation be dedicated to all-electric transit buses;
- Provide support for transformative transportation technologies to populations disproportionately burdened with air pollution; and
- Leverage Volkswagen funds by aligning projects with other state initiatives to yield economic, emissions, and energy benefits.

BYD urges the Department of Natural Resources to take these recommendations into consideration, which will enable Missouri to most efficiently and effectively make the most of its allocation of Volkswagen funds.

Missouri Should Focus Funding on Electric Transit Bus Projects to Maximize Total Cost of Ownership Benefits

BYD's product line of transit and coach buses, ranging from 23' coach buses to 60' articulated transit buses, are American Disabilities Act and Buy America-compliant. They are therefore eligible to help transit agencies in Missouri reduce fuel costs and minimize maintenance expenses, increasing reliability and performance.

Transit buses, by virtue of their high mileage, see even more substantial maintenance and fuel savings than other on-road vehicles. For example, BYD's standard 40' bus can generate yearly savings on the order of \$45,000 per bus. Over a 15-year vehicle lifetime, that can add up to \$675,000 in reduced maintenance and fuel costs. Further, BYD's recyclable battery technology enables these vehicles to operate as much as 200 miles on a single charge, all while producing zero emissions.

In other words, for every dollar invested in all-electric transit buses, Missouri can generate tremendous savings for public transit agencies and their customers while also accomplishing the Environmental Mitigation Trust's goal of reducing emission-caused public health concerns. With these added savings, transit agencies have the option to offer increased services for riders, providing more alternatives to private transportation and thereby further displacing vehicle emissions.

Transit Projects Generate Health Benefits in Areas Disproportionately Burdened by Diesel Pollution

Missouri's air quality issues have led to the designation of several ozone nonattainment counties – Franklin, Jefferson, St. Charles, and St. Louis – that are home to almost 2 million residents including the large population center of St. Louis.¹ By directing funding to vehicles operating in these areas, Missouri can immediately reduce harmful NOx emissions, thereby generating environmental, health, and economic benefits.

BYD SHUTTLES AT KANSAS CITY AIRPORT

Missouri's own Kansas City International Airport made history when it took delivery of its first 30-foot all-electric coach buses. The four BYD vehicles – fully customized to perform as parking lot shuttles – provide Kansas City Airport with a reliable, emissions-free solution capable of generating not only a return on investment but also cost savings within the vehicle's lifetime. These are the first electric buses in service at an airport in the U.S.

The BYD-designed and built iron phosphate batteries come with an industry leading 12-year warranty and allow the buses to run for a full day of driving between terminals and parking lots. The buses were built in the USA at BYD's Coach and Bus manufacturing facility in Lancaster, CA.

¹ "Green Book 8-Hour Ozone (2008) Area Information". United States Environmental Protection Agency, October 5, 2017. <https://www.epa.gov/green-book/green-book-8-hour-ozone-2008-area-information>.

One such funding strategy is to electrify transit buses operating in Missouri’s population centers or along key corridors, such I-29, I-44, and I-70. As the world’s largest producer of battery electric buses, BYD has demonstrated experience and established customer delivery and deployment processes in similar cases. Indeed, BYD has deployed more than 35,000 zero-emission buses internationally and has received orders for over 4,000 additional buses. These buses have accumulated billions of service miles.

Missouri Should Leverage Volkswagen Funds by Aligning Projects with Other State Initiatives to Yield Economic and Energy Benefits

Simply replacing existing diesel vehicles with new (but still conventional fuel) technology may yield limited benefits, but it will do very little in leading the state towards a cheaper, cleaner, and more reliable energy future with greater energy independence. Electric vehicles, however, offer the means to achieve energy security and environmental sustainability while simultaneously creating a driver for economic growth.

BYD TRANSIT BUSES IN COLUMBIA

The City of Columbia has long prided itself on its commitment to public health and sustainability. As a reflection of that commitment, the City began in 2015 to turnover its public bus fleet and has now deployed nine of BYD’s battery-electric transit buses.

This is the first and only battery-electric fleet in revenue service in Missouri and is one of the largest in the Midwest. Columbia is committed to continuing to expand its electric fleet and, by leveraging Volkswagen settlement funds, plans to acquire additional buses in the coming years.

Electric vehicle deployments will also increase domestic energy security by offering drivers and operators a choice of fueling options. According to the Electric Drive Transportation Association, domestically produced grid electricity, on average, can power plug-in vehicles at the equivalent of \$1 a gallon of gasoline. Importantly, this pricing structure is stable as it is insulated from the global volatility that impacts diesel.²

Missouri has already created initiatives, such as Kansas City Power and Light’s Clean Charge Network and the state’s Alternative Fueling Infrastructure Tax Credit, to tackle the need for dedicated charging infrastructure for electric vehicles. The state can ensure that different funding and incentive programs work together by funding electric vehicle projects to complement new charging infrastructure. BYD stands ready to align with and further support those initiatives.

Closing Remarks

The economic, emission, and energy-specific benefits of electrified equipment are clear – all-electric vehicles generate no tailpipe emissions while deliver a lower total cost of ownership over the lifetime of the vehicle than

² “Why Electric Drive?” Electric Drive Transportation Association.
<http://electricdrive.org/ht/d/sp/i/27103/TPL/LandingPageTechIss/pid/27103>.

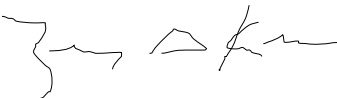
conventional petroleum fuels and natural gas. Further, the commercial-scale heavy-duty electric transportation market is rapidly maturing, as demonstrated by the price reduction of more than 20% in our bus products over the last five years. Adoption of electric technology by Missouri fleets is already under way, as evidenced by the City of Columbia and Kansas City International Airport recently incorporating electric technology to their inventory. This Volkswagen opportunity represents a unique chance to create immediate emission and economic benefits for Missouri's residents, as well as to continue to build the groundwork for a sustainable electric transportation marketplace.

While the Volkswagen settlement provides Missouri the flexibility to fund a variety of conventional and alternative fuel on- and off-road vehicle projects, BYD believes early-market incentive funding is critical to achieving more favorable upfront economics and that increasing sales will lead to cost-competitive purchase prices of all-electric vehicles. We have committed to and successfully delivered substantial price reductions from our first generation of products. We hope to continue this progress in Missouri and support the state in addressing a broad spectrum of environmental issues, resiliency and sustainability chief among them.

BYD thanks the State of Missouri and the Department of Natural Resources for the opportunity to submit these recommendations. We would like to work with you and your team to ensure an efficient and effective rollout of the State of Missouri's Environmental Mitigation Trust funds.

Towards that end, we request an in-person meeting to discuss our recommendations further. We look forward to future collaboration that will help Missouri meet its environmental, fiscal, and social justice goals.

Sincerely,

A handwritten signature in black ink, appearing to read 'Zachary S. Kahn', with a stylized flourish at the end.

Zachary S. Kahn
Director of Government Relations
BYD America



May 4, 2018

Stacy Allen
Air Pollution Control Program
Department of Natural Resources
P.O. Box 176
Jefferson City, Missouri 65102

RE: Beneficiary Mitigation Plan and Implementation Guidelines

Dear Stacy,

Greenlots appreciates the opportunity to provide the Department of Natural Resources (DNR) with comments on both the Draft Beneficiary Mitigation Plan and Draft Volkswagen Trust Implementation Guidelines, as well as recommendations for funds disbursement.

Greenlots is a leading provider of electric vehicle (EV) charging software and services. The Greenlots network supports a significant percentage of the DC fast charging infrastructure in North America, including a modest deployment in Missouri. Greenlots' smart charging solutions are built around an open standards-based focus on future-proofing while helping site hosts, utilities, and grid operators manage dynamic EV charging loads and respond to local and system conditions.

Greenlots is strongly supportive of DNR's proposed investment of the full 15% allowable for light-duty EV charging infrastructure. This investment is critical to supporting EV adoption across the State. The deployment of public charging stations helps facilitate the purchase and use of EVs. Maximizing investment in light-duty EV charging infrastructure complements other State initiatives, including advancing public health, economic, and environmental goals. Because of the emissions associated with light-duty vehicles, the 15% light-duty charging investment represents a critical step toward enabling long-term emissions reductions of NOx and greenhouse gases.

In particular, Greenlots supports the proposed decision to create a highway network of publicly available fast charging stations as articulated in the Implementation Guidelines. Engagement from key stakeholders to create a roadmap for site identification, infrastructure planning, and long-term operation and maintenance is of utmost importance. We agree with DNR's prioritization for corridor DC fast charging, with secondary prioritization given to Level 2 charging at workplaces and multi-unit dwelling locations. The State may also want to consider installation of Level 2 charging at destination locations (e.g., state and national parks) to facilitate tourism throughout the state. Leveraging and/or complementing the Beneficiary Mitigation Trust funds with utility programs can also help maximize funds disbursement.

Greenlots supports DNR's proposal to incorporate the 15% investment in light-duty EV charging as part of an early funding phase. EV charging will be more effective (and help reduce NOx from light-duty vehicles – the largest contributor to mobile NOx) if infrastructure is installed in the near-term. This investment by the State can help transform the market by spurring EV adoption.

Greenlots also has considerations for DNR on how to structure EV infrastructure funds disbursement. Because of the costs associated with deploying infrastructure – which have thus far proven to be uneconomic for the private sector – DNR has an important role to play in designing an effective proposal process in which Trust funds are appropriately matched to site hosts that are prepared for long-term operation and maintenance of charging infrastructure. At this early stage of the market, ownership and operation of charging infrastructure is an appropriate and in many respects necessary role for established actors (e.g., utilities, cities) that are best positioned to offer stewardship and maintenance of infrastructure.

From experience, Greenlots recommends the following proposal considerations for contemplation by the Initial Plan Team:

- For the Infrastructure Plan, we suggest that certain key areas are prioritized to ensure that Trust investments are maximized across the State. The proposal would be structured such that the priority investment locations are installed first.
- For the selection process for the Initial Plan, the proposal should be designed such that individual site hosts do not apply for the funds. Instead, a few program entities should be funded by the State to provide EV charging (either within a turnkey structure or as broader partnerships). Funding one or a few program entities (e.g., utilities, municipalities, a new MODOT unit, etc.) can help ensure more adequate statewide coverage and that site hosts are properly vetted and considered. Turnkey services by such a program entity could include site acquisition, and the acquisition, installation, operation and maintenance of EV infrastructure. Lowest cost of providing EV infrastructure (e.g., cost per plug installed) should not be the only eligibility criteria for this proposal. DNR should also consider customer service, expertise in developing similar charging programs, etc. As the RFP or grant process represents a considerable statewide investment in EV charging, it is vitally important that funds are allocated in such a manner to create a positive EV driver experience and encourage further development of the charging market within the State.
- Require that any EV infrastructure investments adhere to the latest open standards, which can help minimize the likelihood of stranded assets.
- Greenlots supports DNR's proposal for DC fast charging, particularly to facilitate corridor travel, and Level 2 charging at workplaces and multi-unit dwellings.

For the remaining 85% of funds, Greenlots encourages DNR to reconsider its selection process for the competitively scored applications. A comprehensive lifecycle cost and benefit analysis is appropriate, which should capture the long-term emissions benefits, cost savings, and potential

to mitigate climate change. This represents a more accurate cost benefit analysis, rather than using the Implementation Guideline's proposed method of dollars per pound of lifetime NOx emissions reduced as the basis for 90 percent of an application score. While electric buses and vehicles have higher up-front costs, they have reduced fuel and maintenance costs, a longer vehicle lifespan, greater potential to reduce criteria air pollutants and greenhouse gases, and provide health benefits for workers, schoolchildren, and community members. If DNR only considers short-term NOx reductions, it is conceivable that the State may be inadvertently be locked in to a fossil fuel paradigm that could have been mitigated through a more robust approach in the Beneficiary Mitigation Plan.

As such, we encourage DNR to maximize or otherwise consider a specific carve out for transportation electrification opportunities, including for electric fleet, transit, shuttle, and school buses. Technology is advancing toward electrification, and Missouri has an opportunity to be an early adopter and lead by example. By investing in transit and school bus electrification, Missouri would be providing direct benefits to populations that may not directly benefit from light duty EVs or EV charging; bus charging provides both direct and indirect public health and social welfare benefits for transportation users and many surrounding communities—many of which tend to bear a disproportionate share of pollution (e.g., NOx, SOx, PM).

Furthermore, electrification of transit and school buses is a natural fit to provide benefits in disadvantaged and environmental justice communities, who often bear the highest burden of emissions exposure. The proposal to target disadvantaged school districts is laudable, and we encourage DNR to expand the scope to a greater percentage within the school bus replacement program, transit and shuttle bus repower/replacements.

A transformative strategy in the Beneficiary Mitigation Plan can lead to long-term emissions reductions—this objective can only be meaningfully achieved with wide-scale transportation electrification.

Thank you for your consideration. Greenlots will be available as a resource to DNR through the finalization and implementation of the Beneficiary Mitigation Plan. Please do not hesitate to contact me should you have any questions.

Sincerely,

A handwritten signature in black ink, appearing to read 'Thomas Ashley', with a stylized, flowing script.

Thomas Ashley
Vice President, Policy

To: Missouri Department of Natural Resources (DNR)
From: Ronald J. Leone, MPCA Executive Director
Date: April 20, 2018
Subject: Draft Beneficiary Mitigation Plan For The \$41+ Million VW Settlement

I. MPCA. The Missouri Petroleum Marketers & Convenience Store Association (MPCA) is a 300+ member statewide trade association, established in 1937 and located in Jefferson City, Missouri, which represents the majority of the convenience stores, gas stations, truck stops, petroleum marketers and their suppliers all across Missouri.

Many MPCA members are small, second or third generation family owned businesses.

MPCA has previously submitted written statements and oral comments as part of the formal record which are incorporated fully herein by reference.

Please accept this communication as MPCA's formal and public comments regarding Missouri's Draft Beneficiary Mitigation Plan dated 3/30/18.

II. Draft Beneficiary Mitigation Plan Dated 3/30/18.

Page 1 of Missouri's Draft Beneficiary Mitigation Plan states that:

"The Missouri Department of Natural Resources (Department), the state's lead agency as chosen by the governor, developed this draft 10-year Beneficiary Mitigation Plan for awarding the \$41,152,051.74 million in proceeds to Missouri-specific projects based on extensive stakeholder input. Plans for the proceeds, subject to public comment, are as follows:

\$6 million for electric vehicle charging stations built for light-duty vehicles near highways, workplaces, or multiunit residences."

III. The \$41 Million VW Settlement: General Statements.

► MPCA supports the equal and uniform taxing and regulating of any and all motor vehicles and motor fuels including gasoline, diesel, electric, hydrogen, propane, and natural gas (CNG and LNG).

► The \$41 Million VW Settlement is public money.

► Several provisions of the Missouri Constitution prohibit public money and property being used to benefit any "private person, association or corporation".

► MPCA opposes any public money, including any portion of the \$41 Million VW Settlement, being used in any way to compete with the private sector retailers, businesses, and industries which generate jobs, tax revenue, and economic development for the State of Missouri.

IV. No Portion Of The \$41 Million VW Settlement Should Be Used To Build Electric Vehicle Charging Stations Or Other Infrastructure.

In general, MPCA supports using the \$41 Million VW Settlement to stimulate "demand", for example by purchasing newer vehicles, buses, trucks, and locomotives.

However, MPCA strongly opposes using the proposed \$6 million, or any portion of the \$41 Million VW Settlement, to increase "supply" by funding in any way the building of electric vehicle charging stations or other infrastructure which competes in any way with the private sector including motor fuel retailers, businesses, and industries.

Sincerely,

Ronald J. Leone, Esq.
Executive Director,
Missouri Petroleum Marketers & Convenience Store Association (MPCA)
205 E. Capitol Avenue, Suite 200, Jefferson City, MO 65101





Subject: Comments on Missouri Volkswagen Beneficiary Mitigation Plan

Thank you for considering these comments regarding the development of your Volkswagen Beneficiary Mitigation Plan ("VW BMP"). The comments provided are intended to be a compilation of comments for both the Missouri Beneficiary Mitigation Plan and the Missouri Volkswagen Trust Implementation Guidelines. In that regard, the term VW BMP includes both the Mitigation Plan and the Implementation Guidelines and please consider these comments for both documents, where applicable.

The detailed comments in this document are grouped into three main sections:

- Process for Administering Projects,
- Eligible Categories and
- Specific Section Suggestions.

In this letter we are providing recommendations that we believe will help the VW BMP achieve the greatest emissions reduction while also sparking long-term adoption of cleaner technologies, thus resulting in greater emission reduction well beyond the life of the VW BMP.

As a Missouri-based company with over 30 employees, we at Orange EV have focused additional resources to understand the Missouri Volkswagen Beneficiary Mitigation Plan ("VW BMP"). While we have been building trucks here in Missouri for several years and delivering them to 4 different states, we plan to expand significantly to as many as 60 employees by the end of the year to support the VW Mitigation plan. As such, any incentive awards granted to applications from Orange customers would also benefit Missouri's economy while still providing zero emission vehicles for the mitigation of VW emissions.

Thank you for your consideration and effort in developing a plan. Furthermore, thank you for your partnership in the mission to deploy emission-free technologies.

Sincerely,

A handwritten signature in black ink, appearing to read "J. Dake", with a stylized flourish at the end.

Jason Dake
Vice President
Legal and Regulatory Affairs
Orange EV LLC



Please accept our proposed changes to the VW BMP as detailed herein.

Process for Administering Projects

Application Period

Suggestion: Provide an open window for submission and acceptance of applications in the Final VW BMP.

By having an open window, the Department can evaluate applications in a timely manner without having an excessive administrative burden. Furthermore, this will allow private entities time to formulate proposals and funding requirements necessary to achieve emission reduction.

Maximum Funding for Electric

Suggestion: Fund Class 8 Truck (categories #2 and #4) projects at 100% for category #2 projects and 75% for category #4 projects, while funding category #6 projects at 75% as allowed by the Volkswagen Trust and as detailed below.

For Class 8 all-electric solutions, the Volkswagen Trust allows up to 75% of the project to be funded for private fleets and 100% for public; this funding applies to repower or replacement projects and includes charging and infrastructure. To accelerate deployments of heavy duty electrics and to achieve cost parity, incentive amounts should be set at this maximum allowable. These benefits should also allow for augmentation by other private or public funding programs.

Offering maximum incentive levels increases the likelihood of replacing diesels with zero emission vehicles, accelerating widespread adoption, and achieving statewide emission reductions targets. For an analysis of cost parity vs. emissions parity See Appendix A

Award Amount Category #6

Suggestion: Increase the total cap on awards in Category #6 from \$2,000,000 to \$4,000,000.

The current cap on category #6 amounts to 4.9% of total amount of VW funds available to Missouri. This cap represents an insufficient funding amount for the benefits that can be recouped. Due to the terminal truck usage profile with repetitive starts and stops over a 24x7 schedule pulling class 8 loads the emissions add up quickly. Based upon a usage of one-shift, an electric terminal tractor can achieve up to 2 tons of NOx emission reductions per year. Furthermore, the terminal tractor areas of operation are often in or around disadvantaged neighborhoods. Thus, resulting in a greater impact both in amount of reduction and community benefit.

In addition, funds that are not utilized (per the draft VW BMP) would roll into categories #1, #2 and/or #3. As such, the Department has an opportunity to achieve more emission

reduction, while still presenting an opportunity for unused funds to be utilized by other project areas, alleviating any concern that unused funds become stagnant.

Award Timeframes

Suggestion: Utilize an open window of, at a minimum, two years for the Department to accept applications for projects in Categories #4 and #6 in the Final VW BMP.

The two-year window will allow for non-government entities (i.e. private commercial fleets) time to assess their needs, allocate funding, research alternative fuel sources and present a strong application. Failure to provide a two-year window may result in missed opportunities to reduce emissions in a meaningful way.

Eligible Categories

Suggestion: In categories #2 and #4, allow for a more efficient vehicle that performs the same or similar functionality to replace an existing vehicle, e.g. to allow a yard truck to be replacing a non-yard truck the Final VW BMP.

Allowing “similar-for-similar” replacement in Categories #2 and #4 (and perhaps others) has the potential to be transformative, focusing on the operational needs of a facility rather than strictly requiring “like-for-like” replacement. As an example, the role of a yard truck is often performed less efficiently by an over-the-road drayage truck. If the functionality of a diesel on road drayage truck can be replaced with an all-electric yard truck, program goals are met, and the community and environment benefit. This similar-for-similar replacement can result in higher emission reduction when a similar vehicle provides for zero emission while the current replacement (like-for-like) vehicle has not achieved zero emission capabilities. Furthermore, the comparison of similar-for-similar vehicles can be readily scored utilizing the functionality in the EPA Diesel Emission Quantifier tool.

Specific Section Suggestions

§2.2.3 and §2.4.3

Suggestion: Include a provision for infrastructure in both §2.2.3 and §2.4.3 when replacement by an electric vehicle is requested, mirroring the Cost Share Requirements found in §2.6.3 which includes infrastructure cost as well as vehicle costs for electric replacements.

This is a necessary addition as it will help support early adoption of a zero-emission technology by helping defray an additional start-up cost associated with the adoption of electric technology.

§2.2.4 – 25% Penalty

Suggestion: Remove the 25% penalty for electric vehicles from the VW BMP, for the reason detailed below.

VW BMP's overall goal is to "reduce mobile source emissions", this goal conforms to the requirements within the VW Trust. Furthermore, this goal requires a focus on the mobile source itself, as such, a zero-emission vehicle should be the preferred choice for all replacements. However, section 2.2.4 imposes a 25% penalty on the electric vehicle "to account for emissions associated with powering the vehicle." This penalty appears to go beyond the stated goal of the VW BMP, and in fact could result in a selection of vehicles that are less beneficial from a NO_x reduction standpoint.

In addition, by imposing this penalty exclusively on electric vehicles, there is a failure to consider all the additional emissions created in the production, transport and logistic operations for other alternative fuel vehicles which are greater than those emissions from the electric vehicle equivalent sources.

In the MO VW Fund Plan, alternate fuels are not penalized for their additional Scope 1, 2 or 3 emissions. That is why we would highly recommend that the Plan remove the penalty and explicitly follow the goal of the VW BMP and only utilize emission reductions from the mobile sources themselves for scoring purposes.

§2.6.1 – Port Definition

Suggestion: Define "port" not as a seaport or rail yard explicitly, but broadly enough to allow all modes of cargo movement, as detailed below.

To ensure the program would support replacement of vehicles used in warehouses, manufacturing plants and distribution centers in addition to rail yards and seaports, please consider adding the following functional definition of port in the VW BMP– "For purposes of this VW BMP, the term "port" connotes a hub or node in the goods movement supply chain with freight activity that facilitates the distribution of goods by any mode of transportation across marine, air, rail and truck." This is evidenced in various sources:

- The EPA acknowledges the role of land ports in its Ports Primer: 2.1 The Role of Ports and notes that "many considerations related to marine ports may also apply at inland water or land ports".
- The concept of "inland ports" is widely recognized. The article Perspectives on the global supply chain: The emergence of the inland port notes: "Increasingly, this inbound cargo will be transferred directly from an ocean vessel to railcars and then transported to an inland location, away from the more congested port itself, for further processing and distribution. These inland locations, or intermodal centers, serve as "inland ports," with some handling as much cargo volumes as their coastal counterparts. Though the concept of inland ports is not new, these locations are becoming increasingly critical to the global supply chain..."
- The Inland Ports discussion on Envision Freight notes that there are "subtle distinctions separating inland ports from related concepts such as freight villages, or integrated logistics centers" and "**Terminology aside, inland ports are simply an agglomeration of freight activity involving multiple modes.**"



Thank you again for your consideration of our suggestions and for your support of Orange EV and our employees.

Appendix A

The following table provides a comparison of Orange EV yard truck acquisition costs vs. the cost of a Tier 4 diesel refurbishment and highlights the incentive level required to achieve cost parity. What the data doesn't quantify is the "emissions parity" or perhaps better the "emissions advantage" delivered with zero-emission projects. When a pure electric vehicle replaces a diesel, emissions are eliminated (i.e. there are no Tier 4 emissions) and the emissions advantage is permanently captured.

In Orange EV's experience, fleets are making capital last as long as possible and the alternative to a pure-electric solution is usually as stated in the following table. But for the scenario where fleets must purchase a new vehicle (i.e. life extension or purchasing refurbished aren't viable options), assuming \$100,000 per new diesel (rather than the used price illustrated in the table) with 8% taxes, fleets would still require 72%, 66%, 68%, or 51% incentive funding (respectively, left to right on the table) to achieve cost parity.

Offering higher incentive levels increases the likelihood of replacing diesels with zero emission vehicles, accelerating widespread adoption, and achieving emission reductions targets.

Basic Cost Comparison: Orange EV Pure-Electric Terminal Truck Solution vs. Diesel

Costs	REPLACEMENT		REPOWER	
	NEW Extended Duty (160kWh) w/Fast Charge Cabinet	NEW Extended Duty (160kWh) w/Standard Onboard Charging	REMAN Extended Duty (160kWh) w/Fast Charge Cabinet	REMAN Standard Duty (80kWh) w/Standard Onboard Charging
Orange EV truck, base price ¹	\$284,950	\$284,950	\$239,950	\$199,950
Orange EV charging	\$49,950	\$0	\$49,950	\$0
Electrical infrastructure ²	\$20,000	\$6,000	\$20,000	\$6,000
Taxes (estimated 8%)	\$28,392	\$23,276	\$24,792	\$16,476
Total electric vehicle solution:	\$383,292	\$314,226	\$334,692	\$222,426
Comparable diesel truck w/8% tax (refurb)³:	\$54,000	\$54,000	\$54,000	\$54,000
Cost difference:	\$329,292	\$260,226	\$280,692	\$168,426
Percent incentive required to achieve cost parity:	86%	83%	84%	76%

Note 1: The costs shown are for the base price of an Orange EV yard truck. Most fleets pay additional cost to install air conditioning, trailer stops, galvanizing, etc. These are optional costs, but in many places are necessary given the operating environment and/or stipulations in union contracts. For a remanufacture, the fleet must also supply an acceptable donor vehicle.

Note 2: Infrastructure is built out and paid for by the fleet (or site owner if the fleet is contracting services to the site); costs can vary dramatically by site. Costs are typically less for "standard onboard" charging due to lower



voltage and amperage, and more readily available capacity. Factors that increase the cost of infrastructure include running cabling over long distances, installing a transformer, and hiring outside contractors (not as necessary for the standard onboard charging solution).

Note 3: Cost for diesel trucks can range from \$25,000 to \$120,000 based on refurbished vs. new, and the fleet's buying power. In most cases, fleets are not looking to buy a new Tier 4 diesel, but rather extend the life of a current truck or buy a refurbished vehicle that meets emission standards.

From: Popp, Andy
Sent: Friday, May 11, 2018 9:30 AM
To: Bybee, Darcy
Cc: Wilbur, Emily ; Gilmore, David ; Manning, Kristy
Subject: DE Comments on Draft Beneficiary Mitigation Plan

Darcy,
Attached are comments we would like to provide regarding the Draft Beneficiary Mitigation Plan.
Thank you for the opportunity to share our thoughts!

Andy Popp
Manager – Energy Efficiency
Department of Economic Development
Division of Energy

For the latest in Energy news go to the following link: <http://energy.mo.gov/energy>

The draft Beneficiary Mitigation Plan (the Plan) developed by the Department of Natural Resources (DNR), based upon input and comments received from interested stakeholders, is a well-balanced approach to meeting the requirements of the VW Mitigation Trust Settlement as well as addressing the concerns and needs expressed during the public meetings held by DNR. Since the Plan's primary objective is to reduce NOx emissions, the weight given to this for the competitively scored categories and the inclusion of categories that have a high reduction potential, seems to address the importance of achieving that objective.

The Plan addresses in a fair and equitable manner concerns expressed for school districts that are financially stressed and may not be able to participate due to lack of funding available in their district. It also provides for a reasonable opportunity for all school districts that desire, to participate. The "school buses" category also provides a means to distribute funds to all parts of the state and meet an established need of many school districts in the state to replace older buses which also aids in reducing maintenance costs and increasing the fuel efficiency of bus fleets.

Incorporated in the Implementation Guidelines is methodology to encourage participant cost share funds, which helps to extend the reach of the Mitigation Trust funds and increase the opportunity for a greater number of participants. Creating opportunities to develop public-private partnerships can further leverage funds to increase the number of projects achieved and maximize the impact, both environmental and economic. The draft Plan acknowledges the extended planning and spending horizon required to maximize impact and allows for changes as circumstances evolve in order to accommodate new technologies or needs that become evident and not addressed or incorporated in the initial Plan. In addition, allowing for the opportunity to utilize alternative fuels, both those that are produced domestically as well as renewable fuels will contribute to our security long-term as well as reduce NOx emissions.

As more and more vehicle manufacturers turn production toward electric vehicle models, consideration was given in the draft Plan to projected trends in automobile purchasing by providing a portion of the funding for EV charging. Recent testimony and workshops held before the Missouri Public Service Commission indicated that driving EVs produces less air pollution than driving conventional automobiles. Driving EVs could also improve air quality by reducing ground-level ozone and particulate matter, both of which can result in adverse health effects such as lung irritation, asthma, and heart problems. Additionally, providing support for the deployment of electric vehicle charging can help ensure all communities across Missouri remain accessible for business, recreation, travel, and living, especially as transportation modes become more and more electrified.

Overall, the Plan offers an opportunity for many interested stakeholders and providers to participate and includes an opportunity for those meeting the definitions of all 10 eligible categories of the VW Settlement Trust to implement eligible projects. The draft Plan allows for wide distribution and impact of the Mitigation Trust funds and caution should be exercised so that any subsequent revisions to the draft as a result of comments or feedback do not result in reducing the benefit gained from more broadly distributing the funds or decreasing the opportunities available to participants through more restrictive eligibility requirements.

We appreciate the opportunity to provide comments regarding the draft Plan and want to thank the DNR team for its thoroughness in considering comments by stakeholders as the draft Plan was developed. It is a well thought out and balanced approach to utilize the VW Mitigation Trust Settlement.

PETER AND LINDA CATALANO
26 DIETZ COURT
WENTZVILLE, MO 63385
PHONE (636) 398-4394

RECEIVED

MAY 9 2018

DAS Accounting

April 30, 2018

Missouri Department of Natural Resources
P.O. Box 176
Jefferson City, MO 65102-0176

RE: Use of VW Settlement Funds

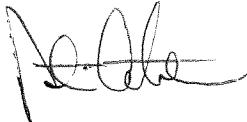
Dear MO DNR:

I have read that the Missouri Department of Natural Resources proposes to spend \$6 million of the Volkswagen settlement fund on electric vehicle charging stations. This is a good idea and I support it.

I urge DNR to go farther in prioritizing electrification in other vehicle categories under the VW settlement.

Thank you for considering these comments. In summary, I urge DNR to prioritize and maximize electrification of vehicles under the VW settlement.

Sincerely,



Peter Catalano

"Think not of yourselves, o Chiefs. Think about the impact of your decisions on the next generation and seven generations beyond."
Iroquois Bylaw

Comments Received via Survey Monkey

Draft Beneficiary Mitigation Plan

#1

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Wednesday, April 04, 2018 12:18:16 PM
Last Modified: Wednesday, April 04, 2018 12:20:33 PM
Time Spent: 00:02:16
IP Address:

Page 1

Q1 Contact Information

First Name	Kim
Last Name	Cella
Email Address	
Affiliation	MPTA
City	St. Louis
State	MO

Q2 The department welcomes comments about the draft plan. Please use this place to express your thoughts about the draft plan and offer specific improvements.

The Volkswagen Environmental Mitigation Trust is an opportunity for Missouri to invest in public transit. We were pleased to see \$4 million allocated in the draft plan for transit buses, and we urge you to consider increasing these funds even more in this category. Public Transit can be an integral part of the mitigation solution especially in light of the interest in MO to moving fleets to electric bus vehicles.

The Missouri Public Transit Association provider members provide more than 62 million rides almost everywhere for everybody every day in Missouri and they employ thousands in our communities. In addition, transit service in this state has a direct impact on our environment. According to national transit experts, public transportation produces 95% less carbon monoxide, 90% less volatile organic compounds (vocs) and about half as much carbon dioxide and nitrogen oxide per mile compared to private vehicles. With more people using public transit, we decrease our reliance on fossil fuels. If one in 10 Americans used transit regularly, U.S. reliance on foreign oil could decline by more than 40%, or nearly the amount of oil imported from Saudi Arabia each year.

Missouri currently provides little assistance for transit providers even though transit provides significant benefits for this state. Last year, the Missouri Legislature allocated only \$1.7 million for transit providers across the state. The Volkswagen Environmental Mitigation Trust is an opportunity for Missouri to make a significant difference in our environment and the state's economy by investing in transit especially if funds are allocated for electric bus vehicles.

Q3 If you prefer, you can upload your comments about the draft plan from a separate file. File types allowed are .pdf, .doc and .docx, and image file types .png, .jpg, .jpeg, and .gif. The size limit is 16MB.

Respondent skipped this question

#2

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Wednesday, April 04, 2018 12:01:25 PM
Last Modified: Wednesday, April 04, 2018 12:45:59 PM
Time Spent: 00:44:34
IP Address:

Page 1

Q1 Contact Information

First Name	Marion
Last Name	Rickard
Email Address	
Affiliation	Electric Vehicle Television
City	Cape Girardeau
State	MO

Q2 The department welcomes comments about the draft plan. Please use this place to express your thoughts about the draft plan and offer specific improvements. Respondent skipped this question

Q3 If you prefer, you can upload your comments about the draft plan from a separate file. File types allowed are .pdf, .doc and .docx, and image file types .png, .jpg, .jpeg, and .gif. The size limit is 16MB.

COMMENTS ON.pdf (81.2KB)

COMMENTS ON THE VOLKSWAGEN TRUST DRAFT BENEFICIARY MITIGATION PLAN

Jack Rickard
Electric Vehicle Television
601 Morgan Oak Street
Cape Girardeau MO 63703

<http://evtv.me>

I am interested in providing feedback on the Draft Beneficiary Mitigation Plan for reducing nitrous oxides in the State of Missouri based on a \$41 million award to the state as the result of Volkswagen's attempt to evade air pollution regulations on its diesel powered vehicles.

Reviewing the plan I see that approximately 85% of the funds are intended for the purchase or retrofit of electric trucks, busses, locomotive switches, and airport ground support equipment with 15% (\$6.1 million) to level 3 charging throughout the state.

I find this plan mindlessly myopic and moronic in design, with essentially no chance of substantially reducing ANY type of fossil fuel emissions in any meaningful way.

The plan heavily emphasizes funding of expensive large commercial vehicles in very tiny numbers and EXTREMELY limited service life. The impact would be truly and egregiously trivial, albeit mercifully brief.

Such moneys and the application of such public moneys should seek to LEVERAGE private investment in such vehicles, ideally motivating the replacement of thousands of gasoline and diesel vehicles with cleaner electric powered vehicles.

The idea is to spend \$41 million to motivate the private vehicle owners to redirect \$1` billion in investments they are going to make anyway in personal and commercial transportation toward vehicles with much lower emissions.

The most effective way to accomplish this as a state agency would be to promote Level 3 charging infrastructure and with heavy emphasis OUTSIDE the urban areas

of Kansas City and St. Louis which are already served, to some degree, with Level 3 charging facilities.

Over 90% of all electric vehicle charging occurs at home or at work with over 80% occurring at home. One of the strongest objections to the purchase of an electric vehicle has to do with the inability to use the vehicle for statewide or **long distance** travel, despite this representing a trivial percentage of the use of the vehicle. But in the minds of the public, this limitation is a deal killer.

I would submit that the best and highest use of these funds to **LEVERAGE** investment by private individuals in MANY electric vehicles, including busses and trucks et al, would be to **invest in solar power Level 3 charging infrastructure** to reduce this perception that it takes too long to charge a vehicle and the charging stations are not where we need them to support travel.

Such charging infrastructure has the potential to become self sustaining through the use of user fees for the power provided. And therefore potentially **UNLIMITED service life** servicing tens or hundreds of THOUSANDS of electric vehicles that cumulatively would have a significant impact on nitrous oxide emissions.

The purchase and/or retrofit of individual trucks or busses would result in a few DOZEN tailpipes and a work life measured in a handful of years.

Electric vehicles are quite past the demonstration level and are increasingly accepted by the public. But the remaining objections ALL have to do with range and time to recharge.

Missouri is WOEFULLY behind states such as California, Florida, New York, Oregon, and others in providing meaningful charging infrastructure despite a key location central to the continent and with major Interstate presence along I70 and I55.

I would urge you to reconsider this plan and place emphasis on structural changes that have the potential of altering emissions for generations, instead of for the six to ten year life of a commercial vehicle.

Missouri Department of Transportation currently has a pilot program on Solar Roadways that could be expanded. This heightens the awareness of the public in possibilities for future renewable energy and is quite related to transportation.

But the vast majority of these funds should go to SOLAR supplied Level 3 charging infrastructure in outstate areas. Currently there are ZERO Level 3 charging stations from the Arkansas Border to the city of St. Louis along Interstate highway 55. Read that as NONE. There is one Tesla Supercharger station in Miner Missouri, but it ONLY services Tesla electric vehicles. It is incapable of charging ANY vehicle at any level from a different manufacturer.

And it is a similar situation across long stretches of highway I70, I44, etc.

The emphasis SHOULD be on SOLAR electricity generation, battery storage, coupled with Level 3 charging in outstate areas for 90% of these funds.

Purchasing trucks and busses and locomotive switches is comically trivial use of these funds, and will cause our state to be derided as a bunch of backward fly-over country hillbillies, wasting the \$41 million dollar windfall on total nonsense.

Airport GSE? Are you serious?

Jack Rickard

#3

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Wednesday, April 04, 2018 12:52:40 PM
Last Modified: Wednesday, April 04, 2018 12:58:56 PM
Time Spent: 00:06:16
IP Address:

Page 1

Q1 Contact Information

First Name	Denny
Last Name	Ward
Email Address	
Affiliation	SMTS, Inc.
City	Fredericktown
State	Missouri

Q2 The department welcomes comments about the draft plan. Please use this place to express your thoughts about the draft plan and offer specific improvements.

While the \$4 Million in the plan to support Public Transit is greatly appreciated, we would like to see those making the decision to consider increasing this allocation. Public Transit in Missouri is a HUGE benefit to our environment and the general public. SMTS, Inc. operates approximately 200 vehicles, with many of them being 2009 or older. Investing in Public Transit is an investment in a better future for Missouri residents and our environment. Thank you for entertaining our comments. Denny Ward, Executive Director - SMTS, Inc.

Q3 If you prefer, you can upload your comments about the draft plan from a separate file. File types allowed are .pdf, .doc and .docx, and image file types .png, .jpg, .jpeg, and .gif. The size limit is 16MB.

Respondent skipped this question

#4

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Friday, April 06, 2018 12:39:58 PM
Last Modified: Friday, April 06, 2018 12:56:06 PM
Time Spent: 00:16:08
IP Address:

Page 1

Q1 Contact Information

First Name	Joseph
Last Name	Dean
Email Address	
Affiliation	Ryan LLC
City	St. Louis
State	MO

Q2 The department welcomes comments about the draft plan. Please use this place to express your thoughts about the draft plan and offer specific improvements.

Dear Missouri Department of Natural Resources,

I'm writing on behalf of Ryan LLC, a tax consulting firm who represents multiple clients interested in applying for the proposed grants provided by the Volkswagen (VW) Environmental Mitigation Trust Settlement.

On behalf of our clients, we think the overall draft plan looks good with a large portion going towards school buses. However, we believe the settlement funds could be allocated a bit more towards the Airport Ground Support Equipment Forklifts while keeping the other categories largely the same.

Having only \$2M for Airport GSE's might not be enough, and our clients have large fleets of older vehicles (and equipment) that could easily be replaced with electric vehicles...allocating the funds in this way would incentivize them to modernize their fleet...thus reducing the largest amount of NOx emissions.

Thanks and best regards,

Joseph Dean
Ryan LLC

Q3 If you prefer, you can upload your comments about the draft plan from a separate file. File types allowed are .pdf, .doc and .docx, and image file types .png, .jpg, .jpeg, and .gif. The size limit is 16MB.

Respondent skipped this question

#5

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Sunday, April 08, 2018 9:28:09 PM
Last Modified: Sunday, April 08, 2018 9:30:08 PM
Time Spent: 00:01:58
IP Address:

Page 1

Q1 Contact Information

First Name	Craig
Last Name	Kreman
Email Address	
Affiliation	Newton County Citizen
City	Joplin
State	MO

Q2 The department welcomes comments about the draft plan. Please use this place to express your thoughts about the draft plan and offer specific improvements.

Looks good, no comments here.

Q3 If you prefer, you can upload your comments about the draft plan from a separate file. File types allowed are .pdf, .doc and .docx, and image file types .png, .jpg, .jpeg, and .gif. The size limit is 16MB.	Respondent skipped this question
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#6

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Tuesday, April 10, 2018 1:07:18 PM
Last Modified: Tuesday, April 10, 2018 1:10:51 PM
Time Spent: 00:03:33
IP Address:

Page 1

Q1 Contact Information

First Name	Lisa
Last Name	Cagle
Email Address	
City	St. Louis
State	MO

Q2 The department welcomes comments about the draft plan. Please use this place to express your thoughts about the draft plan and offer specific improvements.

Please allow more money for transit in this plan. Thousands of people depend on transit to get to work, important appointments, healthcare, school, and every day necessities, not just in urban areas but in rural areas too. Because state funding in MO for transit is so low, using more of the VW money to upgrade to more sustainable transit vehicles would be an excellent use of these funds. Please give transit a larger portion of the funding.

Q3 If you prefer, you can upload your comments about the draft plan from a separate file. File types allowed are .pdf, .doc and .docx, and image file types .png, .jpg, .jpeg, and .gif. The size limit is 16MB.

Respondent skipped this question

#7

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Friday, April 13, 2018 12:38:15 PM
Last Modified: Friday, April 13, 2018 12:39:15 PM
Time Spent: 00:01:00
IP Address:

Page 1

Q1 Contact Information

First Name	Eric
Last Name	McCarthy
Email Address	
Affiliation	Proterra Inc.
City	Greenville
State	SC

Q2 The department welcomes comments about the draft plan. Please use this place to express your thoughts about the draft plan and offer specific improvements.

Please see attached document.

Q3 If you prefer, you can upload your comments about the draft plan from a separate file. File types allowed are .pdf, .doc and .docx, and image file types .png, .jpg, .jpeg, and .gif. The size limit is 16MB.

Proterra Missouri VW Submission.pdf (1.1MB)



April 13, 2018

The Missouri Department of Natural Resources

RE: Proterra Comments on VW Settlement Partial Consent Decrees

Proterra appreciates the opportunity to provide comments on the funding allocated under Appendix D of the 2.0 Liter Partial Volkswagen (VW) Consent Decree and under the 3.0 Liter Partial Consent Decree.

Proterra designs and manufactures the world's most fuel-efficient battery electric bus and features on-route, fast-charge technology that offers functionally unlimited range, as well as an extended range version that enables transit agencies to travel 350 miles on a single charge. Proterra's CATALYST™ bus achieves 22+ MPGe performance, 500%+ better than diesel and CNG buses, eliminating toxic diesel particulate matter and reducing carbon emissions by 70% or more compared to CNG or diesel buses. In addition, the cost of maintenance differential is substantial in comparison to fossil fueled buses. Using the APTA average of 36,000 miles per year and the FTA required 12-year life, a Proterra bus will save a transit agency over \$200,000.00 per bus on average compared to a fossil fuel transit bus.

The state of Missouri has already taken steps to adopt advanced battery electric technology in the heavy-duty space. In September 2017, the Federal Transit Administration awarded the St. Louis Metro Transit \$1.45 million to replace older model diesel buses with battery electric city transit buses in the St. Louis region. The goal is to integrate battery electric buses on specific high-profile routes in the St. Louis downtown and metropolitan area. Battery electric buses will allow Metro to continue to support the region's sustainability and air quality efforts.

<http://www.greencarcongress.com/2017/09/20170917-dot.html>. And in April of last year, St. Louis Metro tested Proterra buses. http://www.stltoday.com/business/local/metro-begins-test-driving-electric-bus-on-downtown-st-louis/article_e4a529e2-8a18-5a76-aae7-6c145c99d4a8.html.

Our mission is simple: to deliver clean, quiet transportation to all communities by replacing heavy-duty, fossil-fueled transit buses with zero-emission public transit buses. The harmful effects of vehicle exhaust from medium and heavy-duty trucks are on the rise and have been for years. The EPA reports that medium and heavy duty vehicles account for 20% of GHG emissions and oil use in the United States' transportation sector, but represent only 5% of the vehicles on the road. Similarly, GHG emissions from heavy duty vehicles across the globe are growing rapidly and are expected to surpass emissions from passenger vehicles by 2030. There is thus a strong need to not only mitigate past criteria pollutant emissions, but to continue to reduce toxic air pollutants in the medium and heavy duty sector.

The Volkswagen settlement provides a much-needed opportunity to address this growing environmental concern and further demonstrate that commercially available zero-emission technologies have the lowest cost of ownership, improved maintenance and performance, and better serve a diverse range of communities' public transit needs, including the reduction of NOx and the elimination of GHG and criteria emissions.

We strongly recommend that Missouri direct 20% of the settlement funds to incentivize the deployment of zero emission, battery electric transit buses and medium duty vehicles to help reduce GHG and NOx emissions and vehicle miles traveled, as well as provide other health and associated benefits throughout Missouri, but particularly in those areas that receive a disproportionate quantity of air pollution from diesel transit fleets. Replacing diesel buses with electric buses is simply one of the best investments the state can make to help electrify public transit.



The electrification of heavy duty vehicles offers a pathway towards achieving the numerous benefits associated with zero emission transit. Indeed, Park City, Utah's recent deployment of Proterra buses is the poster child for why states should emphasize the electrification of transit buses with their VW mitigation funding. In June 2017, Park City Transit deployed six battery electric buses. Since that time, the electric fleet has traveled more than 160,000 miles using 269,400 of kWh electricity, resulting in an average fuel efficiency of 1.7 kWh/mile, or just over 22 MPGe (compared to 4 MPG for Park City's diesel buses). The electric buses have displaced the use of ~ 32,000 gallons of diesel fuel in their first four months alone, while eliminating more than 801,000 lbs. of GHG emissions. Additionally, the electric buses have saved Park City Transit money through the savings in fuel and maintenance. In fact, the cost per mile of operation has dropped from a high of \$0.63 a mile using diesel to a low of \$0.30 using electricity. Not surprisingly, Park City has seen an increase in ridership on those routes utilizing zero emission buses, causing other municipalities to determine how they too can add and/or increase the number of zero emission buses on the road.

We propose that Missouri adopt two specific funding programs that have significantly accelerated the adoption of heavy duty EVs and, as a direct result, helped reduce NOx and GHG emissions. First, we urge Missouri to adopt the competitive funding programs in place in California and at the federal level. The CA Zero-Emission Truck and Bus Program is a competitive funding program that allows all manufacturers of zero-emission technology to partner with transit agencies and compete for project funding. It is very much modeled after the highly competitive Federal Transit Administration's Low or No Emission Program, which has helped fund the purchase of zero-emission transit buses across the US. The CA program is important in that it allows newcomers to receive funding for not only buses, but also chargers (EVSE). Additionally, we suggest that the state pay 110% of only the incremental costs of the buses and required charging infrastructure, much like the state of Colorado has proposed in its draft mitigation plan. This approach will help spur the adoption of a greater number of electric buses among transit agencies, airports and universities. See Exhibit A for a 10-bus project proposal.

Second, we request the Department of Natural to adopt the successful voucher/incentive programs that are helping to accelerate the adoption of heavy-duty EV buses. California's Hybrid & Zero-Emission Truck and Bus Voucher Incentive Program (HVIP) is a pool of money that is used by transit agencies on a first come, first served basis to bridge the gap between purchasing a fossil fuel vehicle and a zero-emission vehicle. For example, the transit bus OEM can receive a voucher for up to \$160,000 per EV vehicle, which amount is then deducted from the cost of the bus. New York City (New York Truck Voucher Incentive Program) and Chicago (Drive Clean Truck Voucher Program) have implemented similar programs. These programs have proven valuable in allowing agencies (and commercial properties) to grow their fleets of zero-emission buses.

Appendix D of the VW Settlement allows each beneficiary to invest up to 15% of its allocation of Trust Funds on costs associated with deploying new, light duty EVSE. Proterra recommends that Missouri dedicate its entire 15% towards electric vehicle charging infrastructure. Proterra's newly-introduced extended range bus, the E2, supports SAE J1772 CCS charging, which is also the standard adopted by many light duty OEMs. Accordingly, the additional investment in charging infrastructure has the added benefit of accelerating EV adoption across the light duty sector as well.

Proterra encourages the Department of Natural Resources to promote the adoption of zero-emission technology, and not "near-zero" technology. Nationally, 7,461,458 tons of NOx, or 55% of the 13,489,110 tons of NOx emitted derive from



mobile sources; 35% attributable to on-road sources.¹ In the state of Missouri, 237,165 tons of NOx, or 59% of the 400,247 tons of NOx emitted are from mobile sources.² On this basis alone, we urge the Department of Natural Resources to use 20% of its funds to advance the electrification of transit buses in those areas disproportionately impacted by the VW diesel vehicle emissions. By doing so, Missouri will help achieve its program goals, including the reduction of NOx, greenhouse gases and other pollutants.

Thank you for the opportunity to provide comments on eligible mitigation projects that will reduce emissions of NOx from vehicles. Please feel free to contact me directly at 864-214-2668 or emccarthy@proterra.com.

Sincerely,

Eric J. McCarthy

SVP, Government Relations, Public Policy and Legal Affairs
Proterra Inc.

¹ <https://www3.epa.gov/cgi-bin/broker?polchoice=NOX& debug=0& service=data& program=dataprog.national 1.sas>

² <https://www3.epa.gov/cgi-bin/broker? service=data& debug=0& program=dataprog.state 1.sas&pol=NOX&stfips=29>

The Public Transit Electrification Project: Sustainable Mobility for Missouri

Project Application Information

Proterra Inc.

Eric J. McCarthy

Private Corporation (Non-Government)

1 Whitlee Court, Greenville, SC 29607

PROJECT SUMMARY

Zero-emission public transit buses are ripe for immediate scaling and investment from the Environmental Mitigation Trust to help carry out the goals of Missouri's mitigation plan to achieve significant and sustained reductions in diesel emissions and expedite deployment and widespread adoption of zero-emission vehicles. The *Public Transit Electrification Project* will initially deploy 10 zero-emission, battery-electric transit buses and 10 multi-use depot charging stations at one or more Missouri municipalities to provide electric mobility for all Missouri residents and serve as a strong spark to accelerate the deployment of ZEVs, reduce diesel emissions and eliminate toxic air pollutants. The size of the project, however, can easily scale to accommodate other interested transit agencies and/or airports.

Proterra, the leading U.S. provider of zero-emission, all-electric transit solutions, designs and manufactures the world's most fuel-efficient battery electric bus and features on-route, fast-charge technology that offers functionally unlimited range, as well as an extended range version that enables transit agencies to travel 350 miles on a single charge. Proterra's CATALYST™ bus achieves 22+ MPGe performance, 500%+ better than diesel and CNG buses, eliminating toxic diesel particulate matter and reducing carbon emissions by 70% or more compared to CNG or diesel buses. To date, Proterra's buses have logged 4.5+ million miles of service in cities across the United States. With over 67 transit customers and over 546 buses on order, Proterra has become the zero-emission technology provider of choice for transit agencies nationwide.

Proterra will manufacture and deploy the commercial zero-emission buses and depot charging stations and will work closely with the participating Missouri municipality or municipalities to successfully implement *the Project*. *The Public Transit Electrification Project* will demonstrate the economic and environmental benefits of accelerating the transition to commercially available ZEV technology, increase ZEV access and education, and eliminate toxic diesel exposures – achieving the goals of Missouri's mitigation plan to improve and protect ambient air quality.

The Public Transit Electrification Project: Sustainable Mobility for Missouri

The goals of this Project are to:

- Reduce NOx emissions to improve air quality and provide health benefits.
- Launch a zero-emission public transit bus pilot project to demonstrate concepts of sustainable mobility in one or more municipalities.
- Increase zero-emission vehicle awareness and access.
- Accelerate scaled zero-emission vehicle deployment.
- Demonstrate the economic and environmental benefits of accelerating the transition to commercially available zero-emission technology to a large cluster of transit routes.
- Provide zero-emission buses to benefit those areas and vulnerable communities that bear a disproportionate share of the State's air pollution burden, eliminating toxic emissions and providing zero-emission miles.
- Lead the transformation and technology transfer for a wide range of commercial fleets.
- Help drive down per-vehicle zero-emission bus costs with the Project's scale.

The objectives of this Project are to:

- Deploy 10 zero-emission, battery-electric transit buses and 10 multi-use depot charging stations to show that commercially available battery electric transit buses better serve communities' transit needs, substantially reduce greenhouse gas emissions, and provide substantial localized air quality benefits for disadvantaged communities.
- Reduce greenhouse gas emissions by up to ~ 1,062 metric tons CO₂e/year.
- Eliminate ~ .45 tons/year of weighted criteria pollutants and PM emissions.
- Provide scalable lessons learned to drive additional deployments of zero-emission heavy-duty technologies throughout Missouri.
- Deploy Proterra buses that charge using the J 1772 CCS standard.

PROJECT DETAIL

The *Public Transit Electrification Project* will deploy 10 zero-emission, battery-electric transit buses and 10 multi-use depot charging stations at the participating Missouri municipality or municipalities. To this end, Proterra is in discussions with some of the largest transit agencies in Missouri. These agencies are located in areas that receive a disproportionate quantity of air pollution from diesel fleets and from diesel NOx.

The VW settlement provides a much-needed opportunity to further demonstrate that commercially available zero-emission technologies have the lowest cost of ownership, improved maintenance and performance, and better serve a diverse range of communities' public transit needs, including the reduction of diesel emissions and the elimination of criteria emissions.

The Public Transit Electrification Project: Sustainable Mobility for Missouri

Proterra – Technology Manufacturer and Project Coordinator

Proterra's zero-emission, battery-electric technology is being deployed in revenue service throughout the nation. Transit agency early adopters, such as Foothill Transit and San Joaquin RTD in California, have demonstrated the technology readiness of Proterra's battery all-electric solutions on urban as well as mixed suburban routes – and now major metropolitan agencies such as SEPTA (Philadelphia) and King County Metro (Seattle) are placing larger orders - 25 and 73 buses respectively. Nevertheless, there is a need for more deployments to demonstrate the economic, performance and lasting environmental benefits of deploying commercially available, cost-saving, zero-emission battery electric buses. The *Public Transit Electrification Project* will accelerate the deployment and adoption of commercially viable, immediately scalable zero-emission public transit buses in similar fleets throughout Missouri and beyond.



For the proposed project, Proterra will offer its extensive experience and expertise in manufacturing, deploying, operating, and maintaining commercial zero-emission buses and infrastructure – working closely with one or more participating transit agencies. To date, Proterra's buses have logged 3+ million miles of service in cities across the United States. Proterra has zero-emission buses operating in revenue-generating service in the following cities: San Joaquin RTD in Stockton, CA, Foothill Transit in Pomona, CA, VIA Metropolitan in San Antonio, TX, University of Montana in Missoula, MT, WRTA in Worcester, MA, TARC in Louisville, KY, LexTran in Lexington, KY, Nashville MTA in Nashville, TN, PVTA in Springfield, MA, Star Metro in Tallahassee, FL, King County Metro, WA, RTC in Reno, NV, Jones Lang LaSalle in Chicago, IL, CATBus in Seneca, SC, Park City Transit, Park City, UT, Sportran in Shreveport, LA, DDOT in Washington, DC, MetroLINK in the Quad Cities, Illinois, DART in Dallas, TX and soon at MTA in New York, NY, and SEPTA in Philadelphia, PA.

The battery-electric buses and charging infrastructure for this project will be manufactured at Proterra's manufacturing facility in Greenville, SC. The close proximity to the transit agency partner will ensure collaboration and ease of maintenance for any needed repairs to the vehicles and charging infrastructure during the 12-year vehicle lifespan.

Eligible Technologies to be Implemented

- **Battery-Electric Bus:** Proterra will replace Class 8, diesel heavy-duty transit buses at one or more transit agencies with 10 Proterra E2 battery-electric buses. Proterra is proposing its 40-foot Catalyst E2 battery-electric bus. The proposed Catalyst E2 bus has a total of 440kWh of on-board energy storage; more than 25% more capacity than other 40' battery electric

The Public Transit Electrification Project: Sustainable Mobility for Missouri

buses on the market. Importantly, the Catalyst was designed from the start exclusively as an electric vehicle. It delivers remarkable route flexibility and has a stellar track record in operational performance. The bus body is made with advanced carbon composites that are extremely light, durable, and resistant to corrosion. The bus body is then paired with an advanced, scalable energy storage system and the most efficient drivetrain on the market. With its durability and corrosion resistance, this platform is designed to safely and to quietly withstand nearly two decades of service. The curb weight of the vehicle is 29,849 lbs. and the Gross Vehicle Weight is 39,050 lbs. The maximum speed is 65 mph (6000 RPM).

- Plug-In Charging System: Proterra is proposing 10 62.5 kWh depot chargers that can be combined to charge a Catalyst E2 440kWh bus from 0% to 100% State of Charge (SOC) in ~ four (4) hours.

Management/Implementation Capacities

Proterra will work directly and collaboratively with a municipality to ensure the successful planning, manufacturing, deployment, operation, and maintenance of the zero-emission public transit buses and charging infrastructure throughout the Project. Proterra will provide significant executive staff resources and a dedicated maintenance employee to ensure a successful deployment of zero-emission vehicles and charging infrastructure and proper training for all existing service and maintenance employees.

The Proterra team members have extensive backgrounds in project management, manufacturing, vehicle deployment, vehicle maintenance and operations, vehicle and infrastructure training, and permitting and other on-site operational needs. The Proterra team will ensure this project is on time and within budget.

Project Objectives and Work Plan

The Project will demonstrate that zero-emission technologies can achieve significant and sustained reductions in diesel emissions in areas that receive a disproportionate quantity of air pollution from diesel fleets - perfectly capturing one of the primary goals of Missouri's mitigation plan. The Project will also help accelerate the deployment and increase the awareness of electric vehicles, as well as provide the opportunity for all state residents to ride in an electric vehicle. It will serve as a major component of a citywide ecosystem that increases awareness of the many options for zero-emission mobility. In turn, this Project will significantly accelerate the adoption of zero-emission vehicles that will reduce greenhouse gas emissions, eliminate criteria pollutants, and provide the opportunity for all residents to go electric today and realize the many associated health benefits.

The Project tasks are divided into four major phases that are necessary to prepare for and conduct the proposed *Public Transit Electrification Project*: 1 – Project Kick-Off, 2 – Production and Delivery, 3 – Entry into Service, and 4 – Reporting and Feedback. Each phase is described below and in further detail, including identifying the entity is performing each task.

The Public Transit Electrification Project: Sustainable Mobility for Missouri

Phase 1 – Project Kick-Off [9 months]

Phase 1 lays the foundation for the success of the *Public Transit Electrification Project*, which includes finalizing all necessary documents and agreements and attending the kick-off meeting and pre-production meetings with end-users.

Phase 2 – Production and Delivery [up to 12 months]

In Phase 2 the zero-emission buses are manufactured and delivered and the charging infrastructure are ordered, delivered, and installed. This includes the site design, permitting, production and installation of each charging station, as well as the status report of the vehicle production and delivery.

Phase 3 – Entry into Service [3 months]

In Phase 3, Proterra will initiate the customer launch process that ensures that the buses are effectively and efficiently received, inspected, accepted and deployed with confidence. About 6 weeks before the delivery of the first bus, Proterra initiates the launch process, which includes providing an overview of the vehicle, the end-user training, and coordination to ensure the end-user to ready for delivery and deployment of the vehicles into service.

Phase 4 – Reporting and Feedback [ongoing]

Throughout the Project, Proterra will provide quarterly status reports to the state and the transit agency. Each vehicle is equipped with an on-board data logger that provides data on bus performance and Proterra will ensure that all necessary data is compiled and reported to both entities.

Project Vehicles, Equipment and Service

Proterra will work directly with a transit agency to ensure a successful execution and completion of the project – including vehicle operation, charging, vehicle maintenance and repair, and data collection. Proterra has worked with multiple transit agencies across the United States. This vast experience will ensure successful implementation.

Proterra will install on-board data loggers in each vehicle to provide performance data on a quarterly basis. Data will include, but not be limited to: fuel/electricity consumption, fueling/charging times, state of charge, battery and odometer readings, relevant telematics, GPS data, hours of operation, temperatures, etc.

Proterra has developed extensive driver and maintenance technician training to ensure successful execution and completion of the proposed pilot project – including, but not limited to, training for vehicle operation, charging, vehicle maintenance and repair, and data collection. The training for both drivers and maintenance technicians includes classroom instruction and hands-on/in-the-seat training. The training will be performed at each end-user location with the appropriate materials available to the participants. The training includes tests that are administered after each classroom session and a certificate of completion after the participants have successfully finished the course. All drivers, maintenance technicians, and transit managers for this proposed project will receive classroom instruction and hands-on training. In addition, Proterra has created a series of “YouTube” style videos that provide an easy reference tool and more background on procedures – such as

The Public Transit Electrification Project: Sustainable Mobility for Missouri

docking the bus successfully, towing the bus safely, using the diagnostic tool, and high-voltage safety.

The Proterra battery-electric bus and charging infrastructure that will be used in the *Public Transit Electrification Project* is the Catalyst E2 extended-range, battery electric vehicle for use on all routes. The Catalyst E2 vehicle, which offers energy capacity of 440 kWh and a nominal range of ~ 250 miles per charge, uses a 62.5 kWh Plug-in Depot Charger that is commercially available with dual charging connectors. Proterra is the only EV bus manufacturer to invest in the standard SAE J1772 CCS for depot charging. This unique offering allows transit agencies to charge their fleet of light duty electric vehicles or offer public charging when the transit buses are not utilizing the chargers.

Using a sophisticated computer model, Proterra can analyze each transit route to ensure that the infrastructure and vehicles are designed and engineered to match the specific minimum charging needs of the 10-bus fleet. The inputs to the route simulation tool include: route distance, speed, stops, layovers, duration, and grade, as well as passenger loading, ambient temperature/HVAC loads, and other accessory devices that use power for the safe and efficient operation of the vehicles. This simulation provides information on charging station needs and location planning, route performance, gradeability and feasibility, fuel savings/cost of operation evaluation, route schedule, and harmful emission reduction calculations.

Proterra has extensive experience installing depot chargers, securing necessary permits with local entities, and addressing electrical needs and grid impacts throughout the country. Proterra will work directly with the end-user in the *Public Transit Electrification Project* and associated utility to ensure that the participating municipality obtains all permits and approvals necessary for the infrastructure, as well as address any grid impacts or electrical needs at the charging location.

Potential Emission Reduction Benefits/Expected Proposed Project Benefits

At Proterra, we're continually refining designs and looking for innovative ways to reduce impact on the environment. Proterra buses produce zero tailpipe emissions and decrease dependency on fossil fuels. Emissions are reduced by an astounding ~ 200,000 lbs. of CO₂ annually each time a dirty diesel vehicle is replaced by a zero-emission bus. Particulate matter from traditional transit buses contains numerous harmful gases and upwards of 40 cancer-causing substances.

A typical diesel bus emits ~ 200,000 lbs. of greenhouse gases annually, while a CNG bus emits ~ 175,000 lbs./year and a diesel hybrid emits ~140,000 lbs./year. A switch to zero-emission buses, which emit no tailpipe pollution, presents a critical opportunity to cut pollution, reduce oil dependence and make Earth a better place.

The Public Transit Electrification Project: Sustainable Mobility for Missouri

Annual Tailpipe Emissions

Emission (lbs/bus/yr)	Proterra	CNG	Hybrid	Diesel
CO	0	1,822	20.59	41.18
CH4	0	792	4.11	4.03
CO ₂	0	169,488	140,976	198,000
GHG (CO ₂ e)	0	190,080	141,083	198,105
NO _x	0	46.73	92.66	92.66
VOC	0	3.82	3.82	3.82
PM (2.5+10)	0	3.52	3.52	3.52
BC	0	0.15	0.15	0.15

<https://greet.es.anl.gov/>

Assumes 36k miles driven per bus per year.

The well-to-wheel GHG emissions avoided for 10 zero-emission transit buses is approximately 1,062 metric tons CO₂e/year. Based on a conservative 12-year lifespan of the zero-emission, battery-electric buses – the project's lifetime well-to-wheel GHG emissions avoided is up to 12,746 metric tons CO₂e (for a 10-bus deployment).

All the vehicles in the proposed project are zero-emission battery-electric vehicles that do not have any tailpipe emissions; therefore, there are no additional NO_x, ROG or PM₁₀ emissions associated with the project. The total tailpipe emission reduction for 10 zero-emission transit buses is .42 tons NO_x/year, 0.0173 tons of ROG/year and .01596 of PM₁₀/year. Combined tailpipe weight emission reductions for criteria pollutants is 0.45 tons/year and 5.44 tons over the lifetime of the project. That reduction more than doubles when well-to-wheel criteria pollutants are considered, reducing ~ 1.0 tons/ year and 11.59 tons over the lifetime of the project.

The estimated cost-effectiveness of the total project dollars per ton of combined criteria pollutant and weighted PM emissions reduced, and dollars per ton of GHG emissions reduced during a 12-year operation for all 10 vehicles are the following:

- Total Cost Effectiveness of GHG Emission Reductions
 - (Capital Recovery Factor x Project Cost)/Annual GHG Emission reductions
 - (.095 x \$8,120,000)/1,062 metric tons of CO₂e = \$726.4/metric tons of CO₂e

The Public Transit Electrification Project: Sustainable Mobility for Missouri

- Total Cost Effectiveness of Criteria Pollutants¹
 - $(\text{Capital Recovery Factor} \times \text{Project Cost}) / \text{Annual criteria pollutant emissions reductions}$
 - $(.095 \times \$8,120,000) / .45 \text{ metric tons weighted criteria pollutants} = \$1,714,222.2 / \text{metric tons of weighted criteria pollutants}$

Proterra used the Carl Moyer Program Guidelines for the cost calculations.

<https://www.arb.ca.gov/msprog/moyer/guidelines/current.htm>.

Economic and Environmental Benefits

The *Public Transit Electrification Project* is both located within and provides direct economic and environmental benefits to one or more municipalities. The proposed project addresses common economic needs of communities, including increasing job readiness and career opportunities, improving transit service, and creating further quality jobs. Proterra will provide on-the-job training and certifications for driver and maintenance technicians to operate, maintain and repair zero-emission heavy-duty vehicles. This will increase job readiness and career opportunities in the growing electric vehicle market and further career opportunities. In addition, Proterra's state-of-the-art zero-emission public transit vehicles will eliminate toxic diesel and other criteria pollutant exposures to passengers – improving transit service within communities. The *Project* will increase quality jobs – including a dedicated Proterra employee to oversee the project, construction jobs to deploy the electric charging stations and other indirect jobs from vehicle component suppliers.

By combining performance, efficiency and design, Proterra's zero-emission, battery-electric transit buses offer the lowest total cost of ownership as compared to conventional diesel transit buses. Proterra's zero-emission transit buses operate with fewer moving parts – reducing maintenance costs associated with oils, filters, fluids, particulate filters, and brakes. In addition, electricity is much less expensive and less volatile than traditional diesel or other petroleum fuel – helping to reduce costs and provide more certainty for operating costs. Proterra's buses have significantly higher fuel efficiency, an average of 1.7 kWh/mile or 23.4 mpg equivalency, which also helps provide significant economic benefits for the participating municipality.

These operational advantages yield at least \$135,000 savings in maintenance costs and \$290,000 in fuel savings as compared to diesel fuel. Therefore, the economic benefits are over \$400,000/bus in savings during the 12-year Federal Transit Agency (FTA) mandated lifetime of the vehicle for the transit agency or agencies participating in the *Public Transit Electrification Project*.

Lastly, we estimate that, over 12 years of operation, the 10 Proterra buses will reduce ~ 1M gallons of diesel fuel. On a per bus basis this equates to 100,000 gallons of diesel saved each year in typical transit operation (e.g., ~36,000 miles per year).

¹ NOx is included in the criteria pollutants and comprises the majority of those pollutants.

The Public Transit Electrification Project: Sustainable Mobility for Missouri

Estimated Project Cost

The estimated total project cost for 10 zero-emission, battery-electric transit buses and 10 multi-use depot charging stations is **\$8,120,000.**² Funding is needed now to further demonstrate that commercially available zero-emission technologies have the lowest cost of ownership, improved maintenance and performance, and better serve a diverse range of communities' public transit needs, including the reduction of GHG and the elimination of criteria emissions.

<u>Item</u>	<u>Cost</u>	<u>Quantity</u>	<u>Subtotal</u>	<u>Taxes</u> <u>0%</u>	<u>Total</u>
Proterra Bus	\$749,000.00	10	\$7,490,000.00		\$7,490,000.00
Depot Charger	\$50,000.00	10	\$500,000.00		\$500,000.00
Regional Service Representative and fringe benefits	\$130,000.00	1	\$130,000.00		\$130,000.00

The above costs assume that the Department of Natural Resources would fund 100% of the purchase price of an all-electric bus and charger. However, the State could potentially double the number of buses funded as part of this proposed project if it uses the funds from the VW trust to fund 110% of the incremental cost of a new electric bus and associated charging infrastructure.

Increase ZEV Awareness and Education

To increase the exposure of the vehicles in the *Public Transit Electrification Project*, Proterra will develop project-specific webpages that will provide information on emission savings, vehicles deployed and funding sources to showcase the environmental and air quality benefits of the *Project* as a model deployment for other regions throughout Missouri and across the nation. Additionally, Proterra will work with the transit agency or agencies to customize bus wraps to include messages that highlight the zero-emission technology and acknowledging the funding sources for the successful deployment.

In addition, Proterra will work directly with any participating municipality and its transit agency to implement an outreach strategy to the community to help raise awareness and education about the health, air quality and other benefits of zero-emission technology. In conjunction with the end-users, Proterra will launch a direct mail and email marketing campaign to generate awareness about the zero-emission transit bus technology in their communities. In addition, Proterra will provide a demonstration bus to circulate prior to the project deployment to help raise awareness and provide education about the vehicle technology. At the launch of service, Proterra will work with the local

² This cost may vary slightly depending on the applicable tax rate, if any, and how the buses are configured and optioned by the participating transit agency. Finally, installation costs for the depot chargers are not included as they vary widely.

The Public Transit Electrification Project: Sustainable Mobility for Missouri

transit partner to execute a local public relations strategy – including press releases, media outreach and a launch event. Proterra will also offer an option to publicly display emissions savings and environmental benefits information on the transit agency's website.

Other

In addition to the above, Proterra strongly recommends that Missouri direct 20% of the VW settlement funds to incentivize the deployment of zero emission, battery electric transit buses and medium duty vehicles to help reduce NOx and GHG emissions and vehicle miles traveled, as well as provide other health and associated benefits throughout Missouri. We also recommend that Missouri dedicate 15% towards EV charging infrastructure.

Beyond this specific project, we propose that Missouri adopt two specific funding programs that have significantly accelerated the adoption of heavy duty EVs and, as a direct result, helped reduce NOx and GHG emissions. First, we urge Missouri to adopt the competitive funding programs in place in California and at the federal level. The CA Zero-Emission Truck and Bus Program – administered through the Air Resources Board - is a competitive funding program that allows all manufacturers of zero-emission technology to partner with transit agencies and compete for project funding. It is very much modeled after the highly competitive Federal Transit Administration's Low or No Emission Program, which has helped fund the purchase of zero-emission transit buses across the US. The CA program is important in that it allows newcomers to receive funding for not only buses, but also chargers. Second, California's Hybrid & Zero-Emission Truck and Bus Voucher Incentive Program (HVIP) is a pool of money that is used by transit agencies on a first come, first served basis to bridge the gap between purchasing a fossil fuel vehicle and a zero-emission vehicle. For example, the transit bus OEM can receive a voucher for up to \$160,000 per EV vehicle, which amount is then deducted from the cost of the bus. New York City (New York Truck Voucher Incentive Program) and Chicago (Drive Clean Truck Voucher Program) have implemented similar programs. These programs have proven valuable in allowing agencies (and commercial properties) to grow their fleets of zero-emission buses.

Conclusion

The *Public Transit Electrification Project* will deploy 10 zero-emission, battery-electric transit buses and 10 multi-use depot charging stations at one or more municipalities to provide electric mobility and serve as a successful pilot project to accelerate the deployment of electric vehicles, reduce NOx emissions, improve air quality and provide health benefits. Proterra is excited to increase zero-emission vehicle awareness and eliminate toxic diesel exposures to both transit riders and non-transit riders throughout Missouri and beyond.

#8

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Monday, April 16, 2018 9:23:20 PM
Last Modified: Monday, April 16, 2018 9:23:52 PM
Time Spent: 00:00:31
IP Address:

Page 1

Q1 Contact Information

First Name	Kelly
Last Name	Turner
Email Address	
Affiliation	City Utilities of Springfield
City	Springfield
State	MO

Q2 The department welcomes comments about the draft plan. Please use this place to express your thoughts about the draft plan and offer specific improvements. Respondent skipped this question

Q3 If you prefer, you can upload your comments about the draft plan from a separate file. File types allowed are .pdf, .doc and .docx, and image file types .png, .jpg, .jpeg, and .gif. The size limit is 16MB.

VW Settlement Letter 20180416.pdf(72KB)



April 16, 2018

Kyra L. Moore, Director
MDNR Air Pollution Control Program
1659 E. Elm Street
Jefferson City, MO 65102

Dear Ms. Moore:

The Volkswagen Environmental Mitigation Trust is an opportunity for Missouri to invest in public transit. In accordance with the trust agreement, Missouri will facilitate the distribution of more than \$41 million in funds to reduce mobile source air pollution emissions. We were pleased to see \$4 million allocated in the draft plan for transit buses, and I urge you to consider increasing these funds even more in this category. Public Transit can be an integral part of the mitigation solution.

City Utilities of Springfield's (CU) Transit Operation provides more than a million rides a year for citizens in our community who have few other transportation options. CU Transit also provides jobs for more than 60 employees in Springfield. In addition, transit service has a direct impact on our environment. According to national transit experts, public transportation produces 95% less carbon monoxide, 90% less volatile organic compounds (VOCs) and about half as much carbon dioxide and nitrogen oxide per mile compared to private vehicles. With more people using public transit, we decrease our reliance on fossil fuels. If one in 10 Americans used transit regularly, U.S. reliance on foreign oil could decline by more than 40%, or nearly the amount of oil imported from Saudi Arabia each year. In addition, according to the American Public Transit Association the state receives a \$4 return for every one dollar invested in transit.

Missouri currently provides little state assistance for transit providers even though transit provides significant benefits for this state. Last year, the Missouri Legislature allocated only \$1.7 million for transit providers across the state. The Volkswagen Environmental Mitigation Trust is an opportunity for Missouri to make a significant difference in our environment and the state's economy by investing in transit especially if funds are allocated for electric bus vehicles. Please keep transit as a part of your solution when developing the plan for investment. Thank you for your consideration and please feel free to reach out with any questions.

Sincerely,

Kelly Turner
Director - Transit

417.863.9000
PHONE

301 EAST CENTRAL STREET
Springfield, MO 65802

P.O. BOX 551
Springfield, MO 65801

cityutilities.net
WEB

#9

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Wednesday, April 18, 2018 11:40:33 AM
Last Modified: Wednesday, April 18, 2018 11:43:16 AM
Time Spent: 00:02:43
IP Address:

Page 1

Q1 Contact Information

First Name	Jeff
Last Name	Reitz
Email Address	
City	Fenton
State	Missouri

Q2 The department welcomes comments about the draft plan. Please use this place to express your thoughts about the draft plan and offer specific improvements. Respondent skipped this question

Q3 If you prefer, you can upload your comments about the draft plan from a separate file. File types allowed are .pdf, .doc and .docx, and image file types .png, .jpg, .jpeg, and .gif. The size limit is 16MB.

CSBS Comment Letter to Missouri 4-18-18.docx(60KB)



Submitted online via <https://www.surveymonkey.com/r/draftBMP>

May 14, 2018

Kyra Moore, Director
Air Pollution Control Program
P.O. Box 176
Jefferson City, MO 65102

Re: Central States Bus Sales' Comments on the State of Missouri Mitigation Plan

Dear Director Moore,

As the President/CEO for Central States Bus Sales (CSBS), I commend Missouri on its efforts to prioritize cost-effective school bus projects. Our experience indicates that the replacement of older diesel school buses is one of the most cost-effective strategies to reduce NOx emissions and improve public health.

Securing lower emission transportation is especially important given that young students are among the most vulnerable to the harmful effects of air pollution, with direct impacts including asthma emergencies and bronchitis.² Propane buses have an extremely strong safety record in terms of public health – propane is a non-toxic, non-carcinogenic, and non-corrosive fuel. Indeed, propane buses are equipped with fuel tanks that are 20 times more puncture resistant than gasoline or diesel tanks.³

Beyond their environmental benefits, propane school buses are a smart investment for Missouri as they can yield fuel cost reductions of 60 percent per gallon and operations and maintenance savings of \$0.37 per mile, compared to diesel.¹ Coupled with their comparatively low purchase price, propane school buses present an extremely cost-effective method of NOx emissions reductions.

Recommendation 1: Adjust the Cost-Share Levels to Encourage School Districts to Put "Skin in the Game"

We appreciate that for certain projects, such as those that will fund local governments and school districts, Missouri could incentivize the purchase of new vehicles up to 100% of the eligible costs. While this would certainly incentivize fleets to take action, we recommend that the state cap the per vehicle

¹ "Propane Testimonials." Blue Bird. <http://www.blue-bird.com/blue-bird/propane-testimonials.aspx>.

funding levels at 50% and also allow for applicants to propose lower state funding levels, should they choose to increase their overall cost-share level.

School districts that are willing to partner and provide a higher cost-share amount should be rewarded by receiving priority in the application process. By doing this, the state can stretch the investment in a clean school bus replacement program farther and help turnover more old diesel buses.

Recommendation 2: Decrease the Disparity in Maximum Funding Levels to Decrease Prioritization of Diesel Engines

The state has proposed to structure the school bus-specific funding levels as follows:

School Bus Fuel Type	Missouri's Proposed Funding Levels
Diesel	100% up to \$45,000 per vehicle
Alternative Fuel	100% up to \$50,000 per vehicle
All-Electric	100% up to \$60,000 per vehicle

While we appreciate the effort put in to differentiate the funding levels between the various fuel types to reflect their different costs, we recommend that Missouri modify the maximum dollar limits. This is due to the fact that the current structure prioritizes diesel projects by virtue of the actual in-state costs for these vehicles.

For example, please see the table below which displays the estimated costs of various school buses. The final column calculates the effective incentive rate by dividing Missouri's proposed funding maximums by the estimated cost. As the table shows, the state's maximum dollar funding levels results in the diesel receiving one of the most favorable effective incentive rates.

School Bus Fuel Type	Estimated Cost of 2019 Model Year School Bus	Effective Incentive Rate, per Missouri's Proposed Funding Limits
Diesel	\$85,000	52.9%
Alternative Fuel	Propane - \$93,000 CNG - \$125,000	Propane – 53.8% CNG – 40%
All-Electric	\$325,000	18.5%

We urge Missouri to address this issue by lowering the maximum dollar funding level for diesel school buses. Ultimately, the currently proposed funding levels are at odds with the state's goals, which, per the state's implementation plan, is to maximize NOx emission reductions. Replacing diesel with diesel will reduce NOx emissions, though in volumes that pale in comparison by replacing diesel with low NOx propane engines, especially when considering in-use emissions during typical school bus duty cycles.

Propane-fueled school buses exist today that are much cleaner than even the cleanest diesel school buses. Compared to the cleanest diesel school buses, propane school buses emit 60 percent fewer NOx emissions, 80 percent fewer smog-producing hydrocarbons, and provide a 100 percent reduction in diesel particulate matter (PM).² In fact, ROUSH's model year 2017 propane school buses recently received its California Air Resources Board certification at 0.05 grams NOx per brake horsepower-hour

² For model year 1998 to 2003 diesel engines, EPA established a NOx emission standard of 4.0 g NOx / bhp-hr. Please refer to EPA's [summary table](#) of diesel engine exhaust emission standards for further detail.

(g/bhp-hr).³ This means that ROUSH's new propane engine is 75% cleaner than today's cleanest diesel bus and 99% cleaner than the oldest, pre-2007 buses operating in many school districts.⁴

Summary

Investing in alternative fuel school buses would allow the state to invest in putting even more clean vehicles on the road and allow school districts to invest more funds into educational programs or providing expanded ridership services.

We hope to support Missouri's continued transition to a better air quality future with the purchase and deployment of alternative fuel buses and offer our support as the planning process moves forward. Should you have any follow-up questions, please reach out to me at the contact information below.

Sincerely,

Jeff Reitz

Jeff Reitz
President
Central States Bus Sales

³ "Executive Order A-344-0074". California Environmental Protection Agency, Air Resources Board, May 15, 2017. https://www.arb.ca.gov/msprog/onroad/cert/mdehdehdv/2017/roush_hdoe_a3440074_6d8_0d05_lpg.pdf.

⁴ For model year 1998 to 2003 diesel engines, EPA established a NOx emission standard of 4.0 g NOx / bhp-hr. Please refer to EPA's [summary table](#) of diesel engine exhaust emission standards for further detail.

#10

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Friday, April 20, 2018 2:37:15 PM
Last Modified: Friday, April 20, 2018 2:40:56 PM
Time Spent: 00:03:41
IP Address:

Page 1

Q1 Contact Information

First Name	Allison
Last Name	Wurtz
Email Address	
Affiliation	KEW Grant Services LLC
City	Knoxville
State	TN

Q2 The department welcomes comments about the draft plan. Please use this place to express your thoughts about the draft plan and offer specific improvements.

In the April 20th, webinar it was noted that there were different emissions factors for diesel vs. propane vs. electric. I'm not sure if these are numbers you all came up with or if thats what the consent decree mandates, and its just not clear and needs to be explained more thoroughly. Please do not use "made up values" for propane or any other alternative fuel because the calculations need to be exact. Very confusing.

Q3 If you prefer, you can upload your comments about the draft plan from a separate file. File types allowed are .pdf, .doc and .docx, and image file types .png, .jpg, .jpeg, and .gif. The size limit is 16MB.

Respondent skipped this question

#11

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Tuesday, April 24, 2018 9:06:00 AM
Last Modified: Tuesday, April 24, 2018 9:07:27 AM
Time Spent: 00:01:27
IP Address:

Page 1

Q1 Contact Information

First Name	Steve
Last Name	Wills
Email Address	
Affiliation	Ameren Missouri
City	Florissant
State	MO

Q2 The department welcomes comments about the draft plan. Please use this place to express your thoughts about the draft plan and offer specific improvements.

Maximizing the amount of funding that goes toward EV charging is critical to move our state forward.

Q3 If you prefer, you can upload your comments about the draft plan from a separate file. File types allowed are .pdf, .doc and .docx, and image file types .png, .jpg, .jpeg, and .gif. The size limit is 16MB.

Respondent skipped this question

#12

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Tuesday, April 24, 2018 9:24:33 AM
Last Modified: Tuesday, April 24, 2018 9:25:48 AM
Time Spent: 00:01:14
IP Address:

Page 1

Q1 Contact Information

First Name	Darryl
Last Name	Sagel
Email Address	
City	St. Louis
State	MO

Q2 The department welcomes comments about the draft plan. Please use this place to express your thoughts about the draft plan and offer specific improvements.

I am supportive of your efforts to accelerate EV adoption through more charging stations, especially on Missouri's highway corridors

Q3 If you prefer, you can upload your comments about the draft plan from a separate file. File types allowed are .pdf, .doc and .docx, and image file types .png, .jpg, .jpeg, and .gif. The size limit is 16MB.

Respondent skipped this question

#13

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Tuesday, April 24, 2018 9:45:49 AM
Last Modified: Tuesday, April 24, 2018 9:51:40 AM
Time Spent: 00:05:51
IP Address:

Page 1

Q1 Contact Information

First Name	Sundarrajan
Last Name	Krishnan
Email Address	
City	Saint Louis
State	MO

Q2 The department welcomes comments about the draft plan. Please use this place to express your thoughts about the draft plan and offer specific improvements.

Better late than never. I'm optimistic about this progress towards a energy efficient and renewable investments

Q3 If you prefer, you can upload your comments about the draft plan from a separate file. File types allowed are .pdf, .doc and .docx, and image file types .png, .jpg, .jpeg, and .gif. The size limit is 16MB.

Respondent skipped this question

#14

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Tuesday, April 24, 2018 10:36:42 AM
Last Modified: Tuesday, April 24, 2018 10:44:00 AM
Time Spent: 00:07:18
IP Address:

Page 1

Q1 Contact Information

First Name	Daryl
Last Name	Lueckenotte
Email Address	
Affiliation	Electric Vehicle Owner
City	High Ridge
State	Missouri

Q2 The department welcomes comments about the draft plan. Please use this place to express your thoughts about the draft plan and offer specific improvements.

Thank you for fully supporting the initiative to install quick charging stations through the state. I see that the funding level was set at the max of 15%. As a current EV owner the expansion of the charging system through the state will be a big boost to the range and distance I can currently drive. This will provide opportunities to others who have range apprehension with purchasing an electric car. Thank you.....

Q3 If you prefer, you can upload your comments about the draft plan from a separate file. File types allowed are .pdf, .doc and .docx, and image file types .png, .jpg, .jpeg, and .gif. The size limit is 16MB.

Respondent skipped this question

#15

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Tuesday, April 24, 2018 10:39:39 AM
Last Modified: Tuesday, April 24, 2018 10:50:52 AM
Time Spent: 00:11:12
IP Address:

Page 1

Q1 Contact Information

First Name	Ron
Last Name	Black
Email Address	
Affiliation	Ameren
City	St. Louis
State	MO

Q2 The department welcomes comments about the draft plan. Please use this place to express your thoughts about the draft plan and offer specific improvements.

I am supportive of your efforts to accelerate EV adoption through more charging stations, especially on Missouri's highway corridors.

Q3 If you prefer, you can upload your comments about the draft plan from a separate file. File types allowed are .pdf, .doc and .docx, and image file types .png, .jpg, .jpeg, and .gif. The size limit is 16MB.

Respondent skipped this question

#16

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Tuesday, April 24, 2018 10:59:02 AM
Last Modified: Tuesday, April 24, 2018 11:01:57 AM
Time Spent: 00:02:54
IP Address:

Page 1

Q1 Contact Information

First Name	David
Last Name	Aten
Email Address	
City	Saint Louis
State	MO

Q2 The department welcomes comments about the draft plan. Please use this place to express your thoughts about the draft plan and offer specific improvements.

Provide a credit for installation of electric vehicle charging stations.

Q3 If you prefer, you can upload your comments about the draft plan from a separate file. File types allowed are .pdf, .doc and .docx, and image file types .png, .jpg, .jpeg, and .gif. The size limit is 16MB.

Respondent skipped this question

#17

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Tuesday, April 24, 2018 3:58:54 PM
Last Modified: Tuesday, April 24, 2018 4:03:14 PM
Time Spent: 00:04:19
IP Address:

Page 1

Q1 Contact Information

First Name	Jim
Last Name	Struckel
Email Address	
Affiliation	EV owner
City	Webster Groves
State	Missouri

Q2 The department welcomes comments about the draft plan. Please use this place to express your thoughts about the draft plan and offer specific improvements.

I am a plug-in EV owner and I support using the max 15% funding for statewide fast charging in Missouri within the draft plan for use of Missouri's allocation of the VW "Dieselgate" funds

Q3 If you prefer, you can upload your comments about the draft plan from a separate file. File types allowed are .pdf, .doc and .docx, and image file types .png, .jpg, .jpeg, and .gif. The size limit is 16MB.

Respondent skipped this question

#18

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Wednesday, April 25, 2018 5:31:35 AM
Last Modified: Wednesday, April 25, 2018 5:33:53 AM
Time Spent: 00:02:18
IP Address:

Page 1

Q1 Contact Information

First Name	Dennis
Last Name	Pestka
Email Address	
Affiliation	Gateway EV Association
City	Elsberry
State	MO

Q2 The department welcomes comments about the draft plan. Please use this place to express your thoughts about the draft plan and offer specific improvements.

I have 2 electric vehicles and support the plan to add charge stations throughout Missouri

Q3 If you prefer, you can upload your comments about the draft plan from a separate file. File types allowed are .pdf, .doc and .docx, and image file types .png, .jpg, .jpeg, and .gif. The size limit is 16MB.

Respondent skipped this question

#19

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Wednesday, April 25, 2018 8:49:10 AM
Last Modified: Wednesday, April 25, 2018 8:50:35 AM
Time Spent: 00:01:25
IP Address:

Page 1

Q1 Contact Information

First Name	John
Last Name	Beck
Email Address	
Affiliation	Ameren
City	St. Louis
State	MO

Q2 The department welcomes comments about the draft plan. Please use this place to express your thoughts about the draft plan and offer specific improvements.

I am supportive of the draft plan.

Q3 If you prefer, you can upload your comments about the draft plan from a separate file. File types allowed are .pdf, .doc and .docx, and image file types .png, .jpg, .jpeg, and .gif. The size limit is 16MB.

Respondent skipped this question

#20

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Wednesday, April 25, 2018 9:57:06 AM
Last Modified: Wednesday, April 25, 2018 9:58:12 AM
Time Spent: 00:01:06
IP Address:

Page 1

Q1 Contact Information

First Name	Lisa
Last Name	Manzo-Preston
Email Address	
Affiliation	Ameren
City	Saint Louis
State	Missouri

Q2 The department welcomes comments about the draft plan. Please use this place to express your thoughts about the draft plan and offer specific improvements.

I am supportive of your efforts to accelerate EV adoption through more charging stations, especially on Missouri's highway corridors.

Q3 If you prefer, you can upload your comments about the draft plan from a separate file. File types allowed are .pdf, .doc and .docx, and image file types .png, .jpg, .jpeg, and .gif. The size limit is 16MB.

Respondent skipped this question

#21

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Wednesday, April 25, 2018 12:07:10 PM
Last Modified: Wednesday, April 25, 2018 12:08:52 PM
Time Spent: 00:01:42
IP Address:

Page 1

Q1 Contact Information

First Name	Subha Bhattacharyya
Last Name	
Email Address	
Affiliation	GEVA
City	FLORISSANT Missouri
State	

Q2 The department welcomes comments about the draft plan. Please use this place to express your thoughts about the draft plan and offer specific improvements.

MO would benefit highly from additional charging stations around highways for Electric Vehicles. This will create jobs and a new EV industry.

Q3 If you prefer, you can upload your comments about the draft plan from a separate file. File types allowed are .pdf, .doc and .docx, and image file types .png, .jpg, .jpeg, and .gif. The size limit is 16MB.

Respondent skipped this question

#22

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Wednesday, April 25, 2018 9:17:24 PM
Last Modified: Wednesday, April 25, 2018 9:23:26 PM
Time Spent: 00:06:01
IP Address:

Page 1

Q1 Contact Information

First Name	Kathleen
Last Name	Kelly
Email Address	
City	Saint Louis
State	Missouri

Q2 The department welcomes comments about the draft plan. Please use this place to express your thoughts about the draft plan and offer specific improvements.

I heartily support adding fast charging stations for electric vehicles along Missouri Highways. Our family has 2 electric vehicles but only one has a gas backup (Chevy Volt - 2013) - so we can't drive our Nissan Leaf on longer drives around the state. We drive up highway 61 to northern Missouri several times a year, and into southwest Missouri along highway 44. I think the availability of more charging would be very helpful in supporting the increased use of electric vehicles in Missouri! Thanks!

Q3 If you prefer, you can upload your comments about the draft plan from a separate file. File types allowed are .pdf, .doc and .docx, and image file types .png, .jpg, .jpeg, and .gif. The size limit is 16MB.

Respondent skipped this question

#23

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Thursday, April 26, 2018 2:03:22 PM
Last Modified: Thursday, April 26, 2018 2:06:55 PM
Time Spent: 00:03:32
IP Address:

Page 1

Q1 Contact Information

First Name	Britta
Last Name	Gross
Email Address	
Affiliation	General Motors
City	Detroit
State	Michigan

Q2 The department welcomes comments about the draft plan. Please use this place to express your thoughts about the draft plan and offer specific improvements.

Please see attached comments.

Q3 If you prefer, you can upload your comments about the draft plan from a separate file. File types allowed are .pdf, .doc and .docx, and image file types .png, .jpg, .jpeg, and .gif. The size limit is 16MB.

Missouri - Draft VW Beneficiary Mitigation Plan - General Motors comments_26 April 2018.pdf(137.2KB)

GENERAL MOTORS

Britta K. Gross Director
Advanced Vehicle Commercialization Policy
Environment, Energy & Safety Policy

General Motors Global Headquarters
MC: 482-C30-C76
300 Renaissance Center
Detroit, MI 48265-3000

26 April, 2018

Missouri Department of Natural Resources

Subject: GM Comments relative to Missouri's Draft VW Beneficiary Mitigation Plan

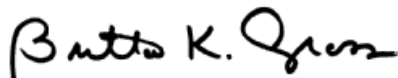
General Motors LLC (GM) appreciates the effort the Missouri Department of Natural Resources (DNR) put into the development of the draft Beneficiary Mitigation Plan and fully supports and appreciates Missouri's decision to firmly allocate the maximum allowed 15% of the fund (equating to roughly \$6mil) to increase the availability of critically-needed electric vehicle (EV) charging stations that will drive both current electrification and advanced mobility strategies for the state.

There are over 4,400 EVs registered in Missouri today and only 25 DC fast-charging stations (SAE industry standard) in the state – virtually all located in Kansas City and St. Louis. According to NREL's recent National PEV Infrastructure Analysis* (September, 2017), Missouri could be home to over 200,000 plug-in EVs by 2030, requiring 370 DC fast-charging stations, 5,900 workplace chargers, and 4,100 additional public Level 2 charge stations. Because the business case for EV charging infrastructure in today's early market is challenging due to high upfront costs and low station utilization, infrastructure investment has been lagging, and therefore we appreciate all efforts in Missouri to develop an infrastructure strategy for the entire state and the commitment to invest in an infrastructure network that addresses consumer and industry concerns.

We are very supportive of the DNR's proposed expert stakeholder process that will ensure that Missouri begins with a comprehensive state-wide vision and strategy for EV charging infrastructure, in order to maximize the effectiveness of limited funds. And we support the prioritization of highway corridor DC fast-charging, workplace charging and multi-unit residence charging.

The VW Environmental Mitigation Trust is an opportunity to invest in forward-looking infrastructure that lays a much-needed foundation for EV market growth and will help attract even more advanced transportation technologies to Missouri. GM greatly appreciates the effort the Missouri DNR put into the development of this initial draft plan and we look forward to assisting in efforts to help drive this emerging market.

Sincerely,



Britta K. Gross, Director
Advanced Vehicle Commercialization Policy

* NREL National PEV Infrastructure Analysis (Sept 2017) -- <https://www.nrel.gov/docs/fy17osti/69031.pdf>

#24

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Friday, April 27, 2018 10:26:43 AM
Last Modified: Friday, April 27, 2018 10:29:14 AM
Time Spent: 00:02:31
IP Address:

Page 1

Q1 Contact Information

First Name	Jeremy
Last Name	Burright
Email Address	
Affiliation	Fairfax R-3 School District
City	Fairfax
State	MO

Q2 The department welcomes comments about the draft plan. Please use this place to express your thoughts about the draft plan and offer specific improvements.

Pros:

1. Much needed assistance to funding for transportation.
2. Increased funding based on financial state of dist.
3. Increased funding based on fuel type of new bus.

Cons:

1. Long wait for funding. Summer of 2019 is a long way off.
-

Q3 If you prefer, you can upload your comments about the draft plan from a separate file. File types allowed are .pdf, .doc and .docx, and image file types .png, .jpg, .jpeg, and .gif. The size limit is 16MB.

Respondent skipped this question

#25

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Monday, April 30, 2018 7:33:33 AM
Last Modified: Monday, April 30, 2018 7:51:53 AM
Time Spent: 00:18:20
IP Address:

Page 1

Q1 Contact Information

First Name	Wayne
Last Name	Garver
Email Address	
Affiliation	Gateway Electric Vehicle Assn.
City	St. Louis
State	MO

Q2 The department welcomes comments about the draft plan. Please use this place to express your thoughts about the draft plan and offer specific improvements.

I support the MO public EV charging stations along highways, at the workplace and in multifamily housing. It is long overdue to provide clean transportation. I suggest that Level 1 be used for workplace charging because of the 8-10 hr charge time. About 50miles of range can be added in this time. The advantages are more charging spaces for the same power, less peak power load, and cheaper to install than Level 2.

Q3 If you prefer, you can upload your comments about the draft plan from a separate file. File types allowed are .pdf, .doc and .docx, and image file types .png, .jpg, .jpeg, and .gif. The size limit is 16MB.

Respondent skipped this question

#26

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Tuesday, May 01, 2018 1:05:16 PM
Last Modified: Tuesday, May 01, 2018 2:14:53 PM
Time Spent: 01:09:37
IP Address:

Page 1

Q1 Contact Information

First Name	Connie
Last Name	Ford
Email Address	
Affiliation	Missouri Public Utility Alliance
City	Columbia
State	Missouri

Feedback on Draft Beneficiary Mitigation Plan

Q2 The department welcomes comments about the draft plan. Please use this place to express your thoughts about the draft plan and offer specific improvements.

Attachment has signed document with the following comments:

Missouri's Draft Beneficiary Mitigation Plan and Implementation Guidelines for the Volkswagen Trust Missouri Public Utility Alliance
Comments

May 1, 2018

The Missouri Public Utility Alliance, on behalf of our municipal utility members, support the funding guidelines as proposed in the draft Missouri Beneficiary Mitigation Plan for the Volkswagen Trust and for the Implementation Guidelines. As a member of the Stakeholder Advisory Group and the Missouri Electric Vehicle Collaborative, I was happy to see \$6 million of funding for electric vehicle charging stations across the state.

To lower Nitrogen Oxides emissions by Missouri residents and those traveling through our state, there is a need for better access to fast electric vehicle charging stations. The Missouri Electric Vehicle Collaborative is a collection of municipal and investor-owned utilities along with environmental non-profit groups. The group determined a state-wide network of charging stations to help alleviate the long-distance charging barrier in Missouri. This map could be a starting point for the Missouri Department of Natural Resources' electric vehicle team to determine how the allotted money is used.

In the draft of Missouri's Implementation Guidelines, it suggests forming a team to develop a strategic plan for how the money allocated for electric vehicle infrastructure. Both the Missouri Public Utility Alliance and our members have planned for the deployment of electric vehicles and support the installation of charging stations. We would volunteer our time to help the state formulate a plan since we have valuable, technical knowledge and experience of integrating charging stations into the electric grid.

Of great value in reducing emissions through electrifying vehicles is the commitment municipal utilities have for renewable energy. Many of our 117 municipal electric utility members have invested in renewable sources for generating electricity and support the transition to electric vehicles. Even though municipal utilities are not required by state law, our members use wind, solar and landfill gas produced electricity. Some communities have as much as thirty percent of renewable resources in their power portfolio. This move to renewable energy coupled with an increasing number of electric vehicles goes a long way to reducing Missouri's Nitrogen Oxides emissions.

Sincerely,
Connie Ford
Director of Member Services
Missouri Public Utility Alliance

Q3 If you prefer, you can upload your comments about the draft plan from a separate file. File types allowed are .pdf, .doc and .docx, and image file types .png, .jpg, .jpeg, and .gif. The size limit is 16MB.

Ford_MPUA_Comments_VWtrustPlanAndImplementation_1May2018.pdf (167.7KB)



Serving Municipal Utilities

**Missouri's Draft Beneficiary Mitigation Plan and Implementation Guidelines for the Volkswagen Trust
Missouri Public Utility Alliance Comments**

May 1, 2018

The Missouri Public Utility Alliance, on behalf of our municipal utility members, support the funding guidelines as proposed in the draft Missouri Beneficiary Mitigation Plan for the Volkswagen Trust and for the Implementation Guidelines. As a member of the Stakeholder Advisory Group and the Missouri Electric Vehicle Collaborative, I was happy to see \$6 million of funding for electric vehicle charging stations across the state.

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Of great value in reducing emissions through electrifying vehicles is the commitment municipal utilities have for renewable energy. Many of our 117 municipal electric utility members have invested in renewable sources for generating electricity and support the transition to electric vehicles. Even though municipal utilities are not required by state law, our members use wind, solar and landfill gas produced electricity. Some communities have as much as thirty percent of renewable resources in their power portfolio. This move to renewable energy coupled with an increasing number of electric vehicles goes a long way to reducing Missouri's Nitrogen Oxides emissions.

Sincerely,

A handwritten signature in blue ink that reads "Connie Ford".

Connie Ford
Director of Member Services
Missouri Public Utility Alliance

#27

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Thursday, May 03, 2018 8:53:38 AM
Last Modified: Thursday, May 03, 2018 8:58:59 AM
Time Spent: 00:05:20
IP Address:

Page 1

Q1 Contact Information

First Name	Randall
Last Name	Ray
Email Address	
Affiliation	IC Bus
City	Lisle
State	IL

Q2 The department welcomes comments about the draft plan. Please use this place to express your thoughts about the draft plan and offer specific improvements.

Please see uploaded letter.

Q3 If you prefer, you can upload your comments about the draft plan from a separate file. File types allowed are .pdf, .doc and .docx, and image file types .png, .jpg, .jpeg, and .gif. The size limit is 16MB.

MO Letter Final.pdf (33.1KB)



IC Bus, LLC
2701 Navistar Drive
Lisle, IL 60532 USA

P :
W :

Randall Ray
Sales Director

May 1, 2018

Missouri Dept. of Natural Resources

Re: Comments to Missouri's Draft Beneficiary Mitigation Plan

Thank you for this opportunity to provide our comments into the Missouri Draft Beneficiary Mitigation Plan. The VW Mitigation Trust presents a tremendous opportunity to reduce diesel emissions and improve the environment. Missouri's allocation of \$41.152M will permit the state to make a dramatic reduction in NOx emissions.

We applaud your recognition of school buses as a key priority, we also applaud the inherent recognition of opportunity to utilize private funds to assist in public institutions as evidenced by the prioritization exhibited in the Executive Summary and further enhanced by the opportunity to upgrade the amount provided to the top 3 allocation categories in the discussion on Contingency for Unused Funds found on Table 3.

According to IHS Polk Registration there are currently almost 1,600 pre-1998 buses in the state and just over 7,400 pre-2010 buses.

Accelerating the retirement of older, higher emitting school buses will reduce emissions immediately in the vicinity of an at risk population – school age children as so noted within both the Draft Plan and the Implementation Guidelines. School age children are still developing full respiratory capability, thus emission reduction efforts minimizing exposure for school age children will provide positive benefits throughout their life.

Funding for school buses within nonattainment areas captures the goal of working within these nonattainment areas where need for the children and the general population is greatest.

Funding for school buses will also provide direct and significant benefits for financially distressed areas needing environmental justice, as these often coincide with the same non-attainment area needs.

We also believe that usage of funds towards new buses provides benefits above the NOx reduction. New school buses can provide the greatest social good, you may be unaware that school buses have unusually long life spans, as such, funding towards school buses therefore extends the timeline of benefits providing the maximum benefit to the environment, the children, and the municipality. Additionally, a new vehicle includes



IC Bus, LLC
2701 Navistar Drive
Lisle, IL 60532 USA

Randall Ray
Sales Director

P :
W :

a complete warranty, reducing the cost of near term repairs from the school operating budget. This is in addition to safety and product improvements available only with a new vehicle.

IC Bus is a wholly owned subsidiary of Navistar, Inc., our Missouri bus dealer, Midwest Transit Equipment is located in Nixa, MO, as well as 18 other bus and truck dealers and service locations throughout Missouri

Investing in school buses is an investment in the state of Missouri. Again, we thank you for this opportunity. Focusing on the schools benefits both the at risk school age population and the larger community. Fiduciary responsibility to the fund and the state would indicate that usage of these funds within public institutions as identified within the plan would be the most transformative choice available.

Should you have any questions, please feel free to contact me at 331-332-3074 or any IC Bus or Navistar representative.

Sincerely,

Randall W. Ray

Randall Ray
IC Bus

#28

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Thursday, May 03, 2018 2:50:14 PM
Last Modified: Thursday, May 03, 2018 2:58:31 PM
Time Spent: 00:08:16
IP Address:

Page 1

Q1 Contact Information

First Name	Robyn
Last Name	Burnett
Email Address	
City	Jefferson City
State	United States

Q2 The department welcomes comments about the draft plan. Please use this place to express your thoughts about the draft plan and offer specific improvements.

Electric vehicles decrease our dependence on fossil fuels and reduce air pollution. As the owner of a plug-in car, I want to thank you for including support for charging stations in your draft plan. However, I think the plan should go further in supporting electric vehicles and would like to see money allocated for electrifying school and transit buses so that children and people who live in cities get the benefits of cleaner air. Thank you for the chance to comment.

Q3 If you prefer, you can upload your comments about the draft plan from a separate file. File types allowed are .pdf, .doc and .docx, and image file types .png, .jpg, .jpeg, and .gif. The size limit is 16MB.

Respondent skipped this question

#29

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Thursday, May 03, 2018 3:41:39 PM
Last Modified: Thursday, May 03, 2018 3:42:42 PM
Time Spent: 00:01:03
IP Address:

Page 1

Q1 Contact Information

First Name	Jay
Last Name	Hoskins
Email Address	
Affiliation	MSD
City	St. Louis
State	MO

Q2 The department welcomes comments about the draft plan. Please use this place to express your thoughts about the draft plan and offer specific improvements. **Respondent skipped this question**

Q3 If you prefer, you can upload your comments about the draft plan from a separate file. File types allowed are .pdf, .doc and .docx, and image file types .png, .jpg, .jpeg, and .gif. The size limit is 16MB.

MSD VW Settlement Comment letter 5-3-18.pdf(72.7KB)



**Metropolitan St. Louis
Sewer District**

2350 Market Street
St. Louis, MO 63103

3 May 2018

Missouri Department of Natural Resources
Ms. Kyra Moore, Deputy Director
PO Box 176
Jefferson City, MO 65102-0176
Electronic Mail (kyra.moore@dnr.mo.gov)

RE: MSD Comments on Volkswagen Trust Draft Beneficiary Mitigation Plan and Implementation Guidelines

Dear Ms. Moore:

MSD appreciates the opportunity to provide the Missouri Department of Natural Resources (MDNR) input on the Volkswagen (VW) Trust Draft Mitigation Plan and the Draft Trust Implementation Guidelines. MDNR staff clearly gave significant thought to the development of these documents. We appreciate this effort, and we look forward to collaborating with the MDNR on how to best utilize these funds to reduce NO_x emissions.

The amounts allocated to award categories should place greater emphasis on whether the award will benefit the metropolitan areas, where the vast majority of affected VW vehicles were owned. The metropolitan areas also have the greatest need for air quality improvement in Missouri. Missouri's plans should be improved in this regard. For example, we do not believe it is fair to the people of metropolitan areas who are most affected by NO_x emissions to dedicate \$12M (29 percent) of the VW settlement to replacing school buses in the manner proposed. We note that nowhere in the implementation guidelines is operational location a factor in the award for new school buses. We further note that many of the school districts in St. Louis City and County use a private bus company, and that these private bus companies are not treated the same (or as well) as the government owned bus fleets. We believe a likely outcome is that the majority of new buses will serve school districts located outside of Missouri's metropolitan areas.

There are many options to making the award program fairer to the metropolitan areas of Missouri. In the Beneficiary Mitigation Plan, please consider setting goals for equitable distribution of the settlement to the metropolitan areas across our state (e.g., St. Louis, Kansas City, Boone County, and Green County). To help accomplish these goals, provide greater flexibility in the award process to move funds between categories. In the Implementation Guidelines, consider providing bonus or preference points to metropolitan areas across all award categories.

As we discussed on April 20, 2018, the Missouri General Assembly has proposed a \$13.5M appropriation for the VW settlement in its FY19 budget. Please clarify how this appropriation will be distributed to the award categories in the Beneficiary Mitigation Plan.

Volkswagen Trust Implementation Guidelines

MSD's remaining comments pertain to the Implementation Guidelines for government trucks.

We strongly encourage removing the cap on awards to an applicant (see section 2.2.2). The projects that are the most beneficial to reducing NO_x emissions should be the ones that receive the award. Also, government services provided on a regional basis allow for more efficient service delivery. However, regional service delivery inherently requires greater resources. Removing this award cap may also support greater NO_x emissions reduction in the metropolitan areas.

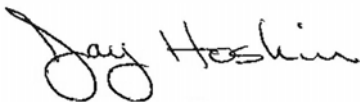
Also, we believe the point system for scoring trucks should allocate a higher percentage for the area of operation. Rather than giving 10 points for area of operation, we suggest using 25 points (and 75 points for emissions reduction).

Regarding emissions reduction calculations, the MDNR should give applicants flexibility to provide alternative modeling or calculations beyond miles driven. For large trucks, emission reduction calculations should at a minimum consider miles driven, the hours of operations, and the truck's use of power take-off (PTO) equipment. These three considerations more accurately predict emissions than only miles driven. Trucks that employ a PTO to operate machinery continue to emit when the vehicle is not moving. More efficient machinery on the truck reduces engine demand and thereby also reduces diesel emissions. Thus, hours of operation and PTO type are important predictors of emissions.

We would also like clarification as to when MDNR will make the award. Can the award be made with proof of receipt (but prior to delivery or use)?

We appreciate the opportunity to provide our input on these plans. Should you have any questions please do not hesitate to contact me at _____ or _____.

Sincerely,



Jay Hoskins, P.E.
Engineering Division, Assistant Director
Metropolitan St. Louis Sewer District (MSD)
10 E. Grand Ave., St. Louis, MO 63147

Cc:
Richard Unverferth
Susan Myers
Jonathon Sprague

#30

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Thursday, May 03, 2018 7:05:34 PM
Last Modified: Thursday, May 03, 2018 7:32:40 PM
Time Spent: 00:27:06
IP Address:

Page 1

Q1 Contact Information

First Name	Henry
Last Name	Robertson
Email Address	
Affiliation	Sierra Club, Great Rivers Environmental Law Center
City	St Louis
State	MO

Q2 The department welcomes comments about the draft plan. Please use this place to express your thoughts about the draft plan and offer specific improvements.

I strongly support DNR's plan to use the 15% maximum allocation of funds for electric vehicle charging infrastructure.

I also support the use of funds for converting school buses and, especially, transit buses, which get more use than school buses, to electrification. While the Plan rates buses relatively low for NOx reduction, there are many other benefits, but these can be best realized by full electrification, not somewhat cleaner diesel or alternative fuels.

Electric buses eliminate ground-level particulate and other pollution. Although these pollutants still issue from power plant smokestacks, they are less than the emissions from diesel buses. Electric buses are quieter, which is a significant improvement for city dwellers. They have few moving parts and so require less maintenance. They cost half as much to fuel, which aids in covering the higher initial cost of the buses.

Buses are used more than other vehicles that are being considered, which multiplies the clean air benefits from converting them to cleaner technologies.

Finally, electrification can transform the market for fully electric buses. With renewable electricity expanding now that its low costs make it the most affordable electricity generating technology, the diminishing role of coal as renewables achieve greater penetration will be an ally in the struggle against disastrous climate change.

Therefore I ask DNR to allocate as much of the available funds as possible to the full electrification of buses or, in the alternative, to increase the incentive levels for electric technologies.

Feedback on Draft Beneficiary Mitigation Plan

Q3 If you prefer, you can upload your comments about the draft plan from a separate file. File types allowed are .pdf, .doc and .docx, and image file types .png, .jpg, .jpeg, and .gif. The size limit is 16MB.

Respondent skipped this question

#31

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Thursday, May 03, 2018 9:58:48 PM
Last Modified: Thursday, May 03, 2018 10:06:09 PM
Time Spent: 00:07:20
IP Address:

Page 1

Q1 Contact Information

First Name	Sherrie
Last Name	Merrow
Email Address	
Affiliation	Natural Gas Vehicles for America (NGVAmerica)
City	Washington
State	DC

Q2 The department welcomes comments about the draft plan. Please use this place to express your thoughts about the draft plan and offer specific improvements.

NOTE: It seems that only one file can be uploaded, so the following is a letter that I have entered below so that I can attach the NGVAMerica VW Flyer that compares vehicle and fuel types to show most NOx reduced for the funds expended. I will submit this same letter as a PDF in our Implementation Guidelines comments.

May 3, 2018

Director Darcy Bybee
Air Pollution Control Program
P.O. Box 176
1101 Riverside Drive
Jefferson City, MO 65102-0176

RE: NGVAMerica Comments on the State of Missouri Draft Volkswagen Trust Beneficiary Mitigation Plan and Implementation Guidelines

Dear Director Bybee:

Natural Gas Vehicles for America (NGVAMerica), the national trade association for the natural gas vehicle industry, respectfully submits the following comments on the State of Missouri (MO) Department of Natural Resources (Department) Beneficiary Mitigation Plan (Plan). These comments are in addition to the NGVAMerica comments submitted to you on April 28, 2017 regarding NGVAMerica's recommendations on how states can best use the Environmental Mitigation Trust (EMT or Trust) funds that each state will receive as part of the Volkswagen (VW) diesel emission settlement. NGVAMerica asks that you also review our April 28, 2017 comments.

Feedback on Draft Beneficiary Mitigation Plan

The VW EMT funds provide an extraordinary opportunity for Missouri and other states to put significantly cleaner, lower-polluting vehicles on the road in public and private fleets. This funding (\$41.1 million) can and should be used by Missouri to continue its commitment to accelerating the use of cleaner, alternative fuels that offer a cost-effective alternative to funding diesel vehicles.

As shown in our VW Comment Letter submitted on April 28, 2017, NGVAmerica believes that natural gas vehicles (both LNG and CNG) offer the best solutions for the projects that will address the goals of the EMT, to reduce the most nitrogen oxide (NOx) for the least cost. Please see the diesel, electric vehicle and natural gas vehicle comparisons on the attached NGVA VW Flyer for heavy duty trucks, transit buses, refuse trucks and school buses.

In addition to the above on-road applications, natural gas also is capable of powering non-road applications such as freight switchers and other locomotives, which are a component of the VW Beneficiary Mitigation Plan (Plan). This natural gas technology effectively provides what would be a Tier 5 emissions freight switcher (labeled Tier 4 until the U.S. EPA puts out the Tier 5 specifications) at Tier 4 diesel freight switcher pricing. Natural gas ferries and ships are also available. We would urge the Department to ensure that any future funding opportunities or solicitations concerning non-road marine or rail projects be open to natural gas.

The Missouri Department states that its overall VW Mitigation Plan's goal is "to reduce mobile source emissions of NOx with maximum cost-effectiveness," which does exemplify the goals of the Trust. NGVAmerica recognizes the value in providing our school children with cleaner air and supports some of the funding to be designated for this application, but it is difficult to understand why the Department has chosen to dedicate \$12-18 million to fund school buses. School buses typically use low amounts of fuel when compared to heavy duty trucks, so emphasizing their replacement delays significant emissions reductions and the achievement of the Department's overall goal.

With school buses as the first funding priority the Department has then set government trucks followed by transit and shuttle buses as their second and third priorities. While these applications use more fuel than school buses, their fuel usage does not compare to that of the Department's lesser priority Award Categories of non-government trucks and locomotives and marine applications. Based on the project applications received the Department should choose projects that reduce the most NOx for the cost, and not move funding from the categories that will fulfill this goal (leaving school buses at \$12 million or less if enough school bus projects are not proposed).

The private sector can efficiently and quickly implement projects that would cost-effectively maximize air quality benefits, leverage supplemental matching funding and provide additional benefits such as alternative fuel infrastructure usage increases (both existing and new facilities). Also, the private sector fleets are usually in areas of emissions concern and so will better meet the goals of the State's VW Plan.

If renewable natural gas (RNG) is used, life cycle greenhouse gas emissions from NGVs are reduced further. Using RNG also creates a market for energy created from waste water treatment, landfills, animal waste and other methane sources and significantly increases air quality by reducing the amount of methane released.

Specific to the Department's Implementation Guidelines, NGVAmerica offers the following observations and suggestions:

- In several award categories the Guidelines state that single or small numbers of vehicles per applicant will be approved. This creates a problem in leveraging funds for alternative fuels that need fueling stations and supports replacements with diesel vehicles. As an example, natural gas vehicle station operators are often willing to build stations to meet demand at their own cost, but they need enough vehicles to warrant the investment. Priority should be given to projects that will best leverage the VW funding.
- The proposed award amounts seem to favor diesel applications since the amounts are virtually the same for natural gas, propane and diesel. NGVAmerica believes that the State would be more effective in accomplishing NOx reduction goals if diesel was treated as the baseline fuel that the MO Plan says should be reduced and therefore receive minimal VW funding (if any, such as in Colorado).
- Emphasis should be placed on ready projects using proven technologies and implementors.

The VW EMT funds provide an extraordinary opportunity for Missouri to cost-effectively accelerate the transition to cleaner vehicles and lower emissions. Commercially available natural gas vehicles offer the best solutions today for addressing the goals of the EMT, delivering the most nitrogen oxide emission reductions for the least cost.

Feedback on Draft Beneficiary Mitigation Plan

Current State Beneficiary Mitigation Plans

Twenty-eight states have released draft VW Beneficiary Mitigation Plans and NGV America has reviewed these plans and offered comments. NGV America believes the Colorado Plan provides an excellent model for other states that wish to segment their funding, maximize the use of alternative fuels, and provide parity among alternative fuels

(https://www.colorado.gov/pacific/sites/default/files/AP_VW_Beneficiary_Mitigation_Plan.pdf).

In allocating its funds, Colorado did not pick a preferred alternative fuel (diesel is excluded except for fleets of 9 or less trucks) and provides a relative parity for funding for the various fuels through its choice of percentage funding by fuel type. The \$18M set aside by Colorado for Alt Fuel Trucks/School and Shuttle Buses funds all alternative fuels at 40% of the vehicle cost for government and public entities, while private vehicles are funded at 25% of the vehicle cost (not the 75% allowed for EVs because that would result in fewer vehicles and less NOx reductions, and there are other sources for EV funding).

Additional Options for Vehicle Scrappage

NGV America also recommends that Department consider the following vehicle scrappage options in the Plan:

- Increase the options for scrappage beyond a strict replacement of a current fleet vehicle (e.g., allow a fleet to acquire an older vehicle from another fleet or allow a fleet to exchange one of its newer vehicles for another fleet's older vehicle that is then scrapped)
- Since the Trust does not specify the fuel of the scrappage vehicle, allow natural gas vehicles that meet the year criteria to be scrapped and replaced with new NGVs

Use the Most Current Emissions and Cost Benefit Calculation Tools – HDVEC created for VW Projects

The Argonne National Laboratory's AFLEET tool should be used to calculate vehicle / fuel type emissions since this tool has recently been updated to include current data on all vehicles and fuels including in-use emissions data. The AFLEET Tool 2017 updates include:

- Added low-NOx natural gas engine option for CNG and LNG heavy-duty vehicles
- Added diesel in-use emissions multiplier sensitivity case
- Added Idle Reduction Calculator to estimate the idling petroleum use, emissions, and costs for light-duty and heavy-duty vehicles
- Added well-to-pump air pollutants and vehicle cycle petroleum use, GHGs, and air pollutants
- Added more renewable fuel options
- AFLEET Tool spreadsheet and user manual at: http://greet.es.anl.gov/afleet_tool and tool link is: <http://www.afdc.energy.gov/tools>

ANL has also just released a new vehicle emissions calculator (HDVEC) to provide state officials and fleet managers with an accurate tool to gauge emissions reductions across various medium- and heavy-duty vehicle project options affiliated with the Volkswagen Environmental Mitigation Trust Settlement. The HDVEC tool is available at: <http://afleet-web.es.anl.gov/hdv-emissions-calculator/>.

The Department has stated that they will use the current U.S. EPA Diesel Emissions Quantifier (DEQ) to calculate emissions reductions. The DEQ tool is not current in its underlying assumptions and data for today's engines and in-use emissions, therefore NGV America recommends that the Department use the HDVEC tool for all applicable categories, since the data is current, easy to use and was created for VW projects.

Summary of NGV America's Recommendations for EMT Funding

- Given that the EMT was created because of NOx pollution associated with non-compliant diesel vehicles, we believe that the funding should be set aside for clean, alternative fuel vehicle projects that focus on maximizing NOx reduction for the funds spent
- Provide a larger incentive and greater overall funding for medium- and heavy-duty engines that deliver greater NOx reductions than currently required for new vehicles and engines
- Target funding for technologies that have demonstrated the ability to deliver actual lower in-use emissions when operated in real-

Feedback on Draft Beneficiary Mitigation Plan

world conditions

- Provide the highest level of funding to applications that produce the largest share of NOx emissions (in most regions this means prioritizing for short-haul, regional-haul and refuse trucks)
- Prioritize funding for commercially available products that are ready for use
- Prioritize funding for clean vehicles rather than fueling infrastructure
- Scale funding to incentivize the cleanest engines available – at a minimum, provide parity among alternative fuels by following a version of the Colorado VW Plan that funds non-diesel alternative vehicles in the private sector at 25% of the cost of the vehicle and public sector vehicles at 40%
- Ensure that funding incentivizes adoption by both public and private fleets
- Prioritize projects that include partnerships that provide a match such as a CNG or LNG station being built in locations that will receive the VW funding
- Accelerate the funding in the early years to maximize the NOx reduction benefits
- Use vehicles emissions measurement tools that reflect current technologies and performance under real world operation duty cycles – Argonne National Laboratory's AFLEET tool and HDVEC tools are the most current tools available

Compared to other alternative fuels and to diesel vehicles, natural gas vehicles that are commercially available today, offer the best solution for addressing the goals of the EMT. The Department recognizes the value of cost effective NOx reductions that NGVs provide, and that these emission reductions can be realized today.

NGVAmerica welcomes the opportunity to provide further information and analysis on the economic and environmental benefits of natural gas vehicles in Missouri. Please contact Jeff Clarke, NGVAmerica General Counsel & Regulatory Affairs Director at _____, or Sherrie Merrow, NGVAmerica State Government Advocacy Director at _____ to set up a meeting and for additional information.

Sincerely,

Daniel J. Gage
President

Q3 If you prefer, you can upload your comments about the draft plan from a separate file. File types allowed are .pdf, .doc and .docx, and image file types .png, .jpg, .jpeg, and .gif. The size limit is 16MB.

NGVA VW Flyer.pdf (755.1KB)

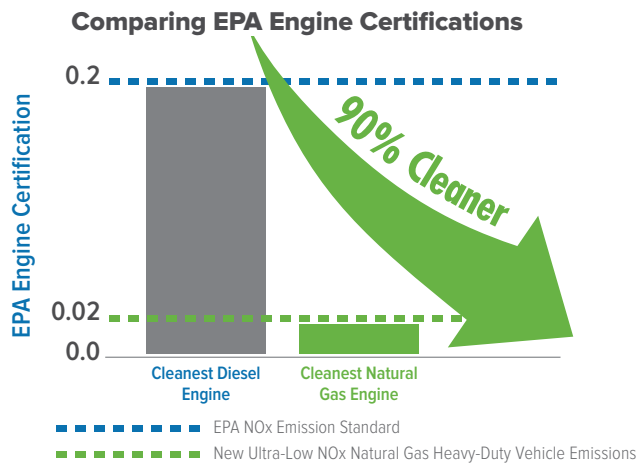
Make a Bold Impact on Air Quality Today

Allocating funds to deploy low-NOx natural gas vehicles provides the best way to deliver immediate and cost-effective NOx reductions and air quality benefit. Nearly 40% of Americans are exposed to unhealthful levels of ozone and particulate pollution. Volkswagen's \$2.9 billion Environmental Mitigation Trust fund provides each state an incredible opportunity to make an immediate and tangible impact on air quality by targeting medium- and heavy-duty vehicles, the leading source of these toxic air contaminants in almost every metropolitan area.

Natural gas vehicles (NGVs) are transforming the medium- and heavy-duty transportation sector.

Sustainable:

NGVs Offer the Cleanest Heavy-Duty Truck Engines in the World



Natural gas medium- and heavy-duty engines provide unmatched reductions of smog-forming emissions of nitrogen oxides (NOx). In 2015, a revolutionary natural gas engine was certified by the U.S. Environmental Protection Agency and California Air Resources Board to a level 90% below the EPA's current exhaust standard and 90% below the cleanest diesel engine. A truck with this engine has an emission profile equivalent to that of a heavy-duty battery electric truck.

Available:

NGVs are Commercially Available Today Across All Applications Qualified for Funding

NGVs are commercially available from traditional truck and bus OEMs with established sales and service networks. Retrofit and repower options are also available from a variety of manufacturers.

- Applications Include:**
- Heavy Semi Tractor
 - Single Axle Van
 - Cement Mixer
 - Large Walk In Van
 - School Bus
 - City Delivery Truck
 - Motor Coach
 - Shuttle Bus
 - Conventional Van
 - Rack Truck
 - Transit Bus
 - Dump Truck
 - Refrigerated Van
 - Tow Truck
 - Fuel Truck
 - Refuse Truck
 - Utility Truck

Responsible:

Dollar-for-Dollar, NGVs Deliver the Most Cost-Effective NOx Emissions Reductions

The calculations shown below assume the deployment of the cleanest commercially available model for each application. Funding natural gas vehicles will lead to the largest total reduction in NOx emissions.

Short/Regional Haul Trucks

\$39
per lb of NOx

Natural Gas
Technology Cost \$150,000
NOx Reduced 3,810 lbs

\$54
per lb of NOx

Diesel
Technology Cost \$100,000
NOx Reduced 1,858 lbs

\$85
per lb of NOx

Electric
Technology Cost \$324,000
NOx Reduced 3,810 lbs

Refuse Trucks

\$140
per lb of NOx

Natural Gas
Technology Cost \$300,000
NOx Reduced 2,141 lbs

\$190
per lb of NOx

Diesel
Technology Cost \$270,000
NOx Reduced 1,417 lbs

\$313
per lb of NOx

Electric
Technology Cost \$670,000
NOx Reduced 2,141 lbs

School Buses

\$220
per lb of NOx

Natural Gas
Technology Cost \$148,000
NOx Reduced 671 lbs

\$291
per lb of NOx

Diesel
Technology Cost \$115,000
NOx Reduced 396 lbs

Not Commercially Available

Electric

Transit Buses

\$273
per lb of NOx

Natural Gas
Technology Cost \$360,000
NOx Reduced 1,318 lbs

\$540
per lb of NOx

Diesel
Technology Cost \$300,000
NOx Reduced 555 lbs

\$569
per lb of NOx

Electric
Technology Cost \$750,000
NOx Reduced 1,318 lbs

#1

Natural Gas Producer in the World



90+

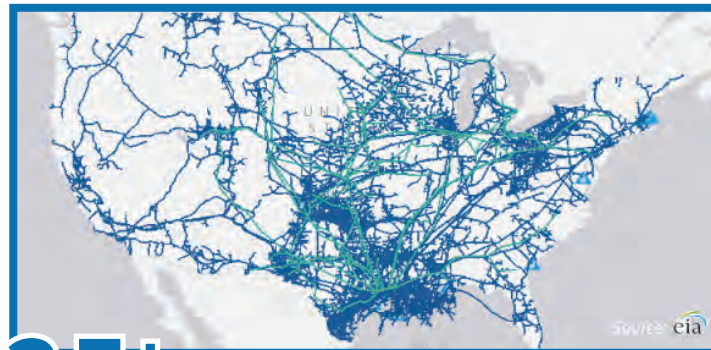
years
supply of recoverable
natural gas

Continual supply by harnessing
renewable sources



2.5+
million

miles of U.S. pipeline
infrastructure

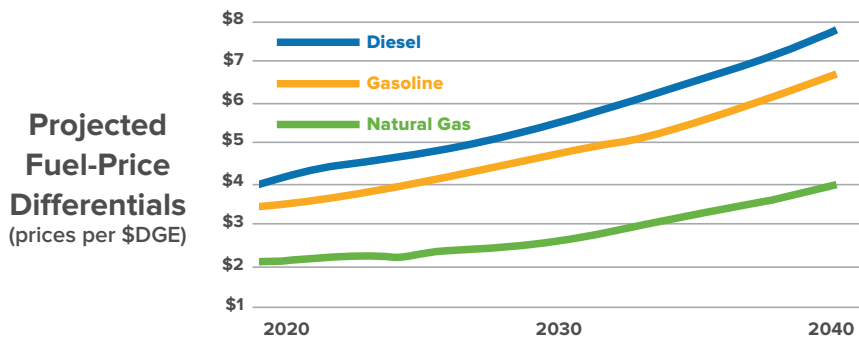


The U.S.' expansive natural gas pipeline system is well poised to support a national network of natural gas fueling stations. Nearly 2,000 CNG and LNG fueling stations are operating today, with continual expansion underway.

Source: U.S. Energy Information Administration

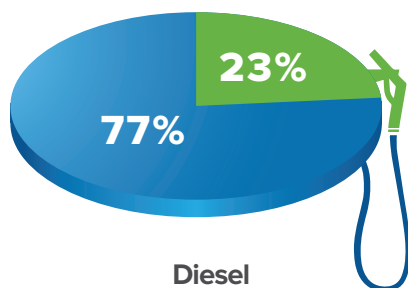
Natural gas is a clean, low-cost, and domestically abundant transportation fuel.

Natural Gas Provides Long-Term Fuel Price Stability and Cost Savings

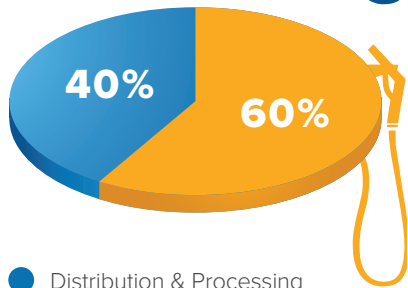


Source: U.S. Energy Information Administration

Natural Gas



Diesel



- Distribution & Processing
- Natural Gas Commodity Cost
- Crude Oil Commodity Cost

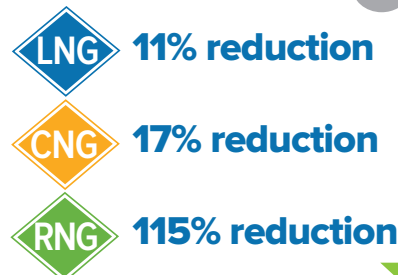
Currently, natural gas prices can be \$0.75 to \$1 or more lower than diesel at the pump, with a firm price advantage expected to remain for decades as shown in the chart above.

Beyond the fuel-price differential, the pump price of natural gas remains relatively stable for two reasons. First, it is domestically sourced. Second, the commodity cost of natural gas only makes up 23% of the pump price so price fluctuations have minimal impact.

In contrast, approximately 60% of the price of diesel fuel is impacted by the market cost of crude oil, which is largely sourced from politically unstable, high-conflict regions. When crude oil prices increase, diesel prices follow suit which can lead to significant swings in a fleet's fuel costs.

Natural Gas Reduces WTW Greenhouse Gas Emissions

Compared to Diesel:



Source: NGV America Fleets Run Cleaner on Natural Gas White Paper 2016



Volkswagen EMT Funding Recommendations

- ✓ Fund alternative fuel vehicle projects that cost effectively maximize NOx reductions for both public and private fleets
- ✓ Provide higher funding levels for medium- and heavy-duty engines that deliver NOx reductions greater than current EPA standards
- ✓ Target funding for technologies that have demonstrated lower in-use emissions
- ✓ Prioritize funding for commercially available products and projects that are ready to begin
- ✓ Stay flexible in plans and leverage private investment to stretch dollars and get more alternative vehicles on the road

Natural gas vehicles can fulfill all of these recommendations today!

#32

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Friday, May 04, 2018 8:18:51 AM
Last Modified: Friday, May 04, 2018 8:20:07 AM
Time Spent: 00:01:15
IP Address:

Page 1

Q1 Contact Information

First Name	Cara
Last Name	Shaefer
Email Address	
Affiliation	
City	City Utilities of Springfield, MO
State	Springfield

Q2 The department welcomes comments about the draft plan. Please use this place to express your thoughts about the draft plan and offer specific improvements.

Missouri

Respondent skipped this question

Q3 If you prefer, you can upload your comments about the draft plan from a separate file. File types allowed are .pdf, .doc and .docx, and image file types .png, .jpg, .jpeg, and .gif. The size limit is 16MB.

City Utilities Comments - 5-4-2018.pdf (89.2KB)



May 4, 2018

Missouri's Draft Beneficiary Mitigation Plan and Implementation Guidelines for the Volkswagen Trust City Utilities of Springfield Comments

City Utilities of Springfield, Missouri (City Utilities) is a progressive community-owned utility serving 320 square miles in southwest Missouri with electricity, natural gas, water, broadband, and public transportation services.

We have been part of the Missouri Electric Vehicle Collaborative and are pleased that the Missouri Department of Natural Resources (MDNR) has allocated \$6.1 million dollars towards the effort of expanding Electric Vehicle Charging across the state to lower Nitrous Oxide (NOx) emissions. We are well positioned geographically to help alleviate the long-distance charging barrier in Missouri. City Utilities is supportive of the team approach to develop a strategic plan for allocating the funding and are interested in providing our time, knowledge and experience towards achieving this goal.

Additionally, City Utilities owns and operates the city's public transit system, providing over a million trips each year to our community. We are pleased to see the allocation of \$4 million dollars for the repowering or replacement of transit buses. The implementation plan outlines that half of this funding will be used in specific target areas of the state. Given the tremendous cost for these upgrades, we encourage MDNR to consider providing additional funding through the implementation process should other award categories have insufficient projects submitted.

When it comes to the environment, City Utilities takes pride in our *Mission to Responsibly serve our customers and community beyond their expectations*. One of our six strategic goals is to *Serve our customers in ways that are ethically, fiscally and environmentally responsible*. To meet that goal, City Utilities continues to provide reliable electric generation with the quality of Springfield's natural environment at the top of our minds. We have made extraordinary reductions in emissions from in our electric generation fleet, and in 2017 we achieved an 89% reduction in total emissions from 1988 levels. CU has actively worked to increase Springfield's renewable energy mix, reaching 29% of System Sales in 2017. That number is estimated to increase to 32% in 2018 and 40% in 2019.

This commitment to reducing emissions coincides with the goal of the Environmental Mitigation Trust Agreement and MDNR's work to reduce NOx emissions through the VW Trust.

Sincerely,

Cara Shaefer
Director – Energy Services & Renewables

#33

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Friday, May 04, 2018 8:34:44 AM
Last Modified: Friday, May 04, 2018 8:44:16 AM
Time Spent: 00:09:32
IP Address:

Page 1

Q1 Contact Information

First Name	Brett
Last Name	Barry
Email Address	
Affiliation	
City	Clean Energy Fuels
State	Charleston
	South Carolina

Q2 The department welcomes comments about the draft plan. Please use this place to express your thoughts about the draft plan and offer specific improvements.

Respondent skipped this question

Q3 If you prefer, you can upload your comments about the draft plan from a separate file. File types allowed are .pdf, .doc and .docx, and image file types .png, .jpg, .jpeg, and .gif. The size limit is 16MB.

Missouri Draft Mitigation Plan Comments 5-4-18.pdf(48.3KB)



May 4, 2018

Director Carol S. Comer
Department of Natural Resources
P.O. Box 176
Jefferson City, MO 65102

RE: Volkswagen Settlement Emissions Mitigation Plan

Dear Director Comer:

Clean Energy (CE) is North America's largest provider of natural gas motor fuel. We have well over 500 refueling stations in our network with several in Missouri.

CE greatly appreciates the opportunity to comment on Missouri's draft mitigation plan under the Volkswagen Settlement. We agree with the central goal of the plan: *"Missouri's overall goal for use of the VW Trust funds is to reduce mobile source emissions of NOx with maximum cost-effectiveness."* In order to achieve this goal, we strongly encourage Missouri to put in place a funding cap for all vehicle grants under the mitigation plan of 25 percent of the total vehicle cost, excepting port drayage and grants under DERA.

Under the Settlement all private sector vehicle grants are capped at 25 percent of the total vehicle cost, except those for electric vehicles (EVs), which can receive up to 75 percent. There is no basis for skewing the funding in favor of EVs. While EVs have zero tailpipe emissions, emissions are created in generating the electricity which powers them. Let us be clear; we are not against electric vehicles. Rather, the array of technologies and fuels deserve equal treatment given the clear goal of the mitigation plan to reduce NOx emissions.

California's South Coast Air Basin is the worst polluted region for smog in our nation with roughly 80% of NOx emissions coming from mobile sources. It is therefore important to note that the local air district for the region – the South Coast Air Quality Management District – views the new heavy duty near-zero natural gas engine offered by Cummins-Westport to be "zero-emission equivalent" when it comes to NOx emissions. This estimate is based on the region's mix of electrical generation powering their grid; a grid that happens to be one of the cleanest grids in the country. When comparing Southern California's electrical grid cleanliness to the State of Missouri's which is more heavily dependent upon coal, one could conclude that the NOx benefits from a near zero natural gas engine would deliver substantially greater NOx emissions reductions than an electric vehicle that uses Missouri's electric grid. Finally, the pollution generated from heavy-duty trucks is significant and perhaps the most cost-effective strategy available to air quality regulators in addressing NOx.

Lastly, while it is stated in the draft mitigation plan that out of all the categories private sector trucks will provide the second greatest amount of lifetime NOx reductions, only 15 percent of the total funds have been set aside for private sector trucking. It is the private sector that will facilitate the most transformational change in transportation as it will support the expansion of alternative fuel refueling networks. We, therefore, respectfully request that either additional funds be put into the private sector truck category now or in the future funds be transferred from other under-utilized categories.

Thank you for the opportunity to comment and for considering our requests.

Regards,

A handwritten signature in black ink, appearing to read "Brett Barry". The signature is stylized with a large, looped "B" and a long, sweeping underline.

Brett Barry

#34

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Friday, May 04, 2018 10:30:22 AM
Last Modified: Friday, May 04, 2018 10:31:42 AM
Time Spent: 00:01:20
IP Address:

Page 1

Q1 Contact Information

First Name	Michael
Last Name	Berg
Email Address	
City	Saint Louis
State	MO

Q2 The department welcomes comments about the draft plan. Please use this place to express your thoughts about the draft plan and offer specific improvements.

These are comments from 396 Missourians who support electric vehicles and use of the settlement fund to promote electric vehicles, collected by the Sierra Club.

Q3 If you prefer, you can upload your comments about the draft plan from a separate file. File types allowed are .pdf, .doc and .docx, and image file types .png, .jpg, .jpeg, and .gif. The size limit is 16MB.

Volkswagen Settlement Comments.pdf (1.3MB)

Carol Comer, Director, Missouri Department of Natural Resources
1101 Riverside Drive
Jefferson City, MO 65102-0176

Subject: Comments on Draft Volkswagen Settlement Plan

I want to thank the Missouri Department of Natural Resources for its proposal to spend \$6 million of the Volkswagen settlement fund on electric vehicle charging stations. This is an important step in revolutionizing our transportation system with clean electric cars. I also thank the DNR for its plan to spend \$2 million on electrifying airport ground equipment and forklifts. These amounts should be maintained and not reduced in DNR's final plan.

I urge DNR to go farther in prioritizing electrification in other vehicle categories under the VW settlement.

Electric vehicles are inherently cheaper than fossil fuel vehicles in terms of fuel and maintenance costs. When deciding how to spend funds in other vehicle categories, DNR should consider the cost-effectiveness of proposals over the lifetime of the vehicle. A project that electrifies a bus, for example, will have a lower lifetime cost to the transit agency or school district than switching to a newer diesel or natural gas engine. That allows funds saved on fuel and maintenance to be spent on more electric buses. That's both a wise investment of these limited funds and it maximizes public health benefits by reducing air pollution.

DNR should also prioritize electrification of vehicles in all other categories of the settlement, such as municipal and non-government trucks and railroad switchyard trucks and locomotives. Again, this will deliver the maximum air quality benefits to people living near these sources of pollution.

Thank you for considering these comments. I urge DNR to prioritize and maximize electrification of vehicles under the VW settlement.

Sincerely,
Michael Berg
1459 Gregg Ave.
Saint Louis, MO 63139

Carol Comer, Director, Missouri Department of Natural Resources
1101 Riverside Drive
Jefferson City, MO 65102-0176

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Sincerely,
Victoria Ford
5212 NW 82 Terr
Kansas City, MO 64151

Carol Comer, Director, Missouri Department of Natural Resources
1101 Riverside Drive
Jefferson City, MO 65102-0176

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Thank you for considering these comments. I urge DNR to prioritize and maximize electrification of vehicles under the VW settlement.

There's NO DOWNSIDE to electric vehicles. No emissions. Renewable, locally generated power will run them. Mileage is incredible. DO THIS!

Sincerely,
Anthony Wilson
401 McBain Ave
Columbia, MO 65203

Carol Comer, Director, Missouri Department of Natural Resources
1101 Riverside Drive
Jefferson City, MO 65102-0176

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Sincerely,
Sue Kaiser
2444 Helen Ave.
Saint Louis, MO 63144

Carol Comer, Director, Missouri Department of Natural Resources
1101 Riverside Drive
Jefferson City, MO 65102-0176

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Sincerely,
Joseph Thomas
17723 Old BB
Holt, MO 64048

Carol Comer, Director, Missouri Department of Natural Resources
1101 Riverside Drive
Jefferson City, MO 65102-0176

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Sincerely,
Bill Mozingo
1101 s pleasant
Grant city, MO 64456

Carol Comer, Director, Missouri Department of Natural Resources
1101 Riverside Drive
Jefferson City, MO 65102-0176

Subject: Comments on Draft Volkswagen Settlement Plan

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Sincerely,
Jan Powers
2917 Pine Hill Spur
Cape Girardeau, MO 63701

Carol Comer, Director, Missouri Department of Natural Resources
1101 Riverside Drive
Jefferson City, MO 65102-0176

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Thank you for considering these comments. I urge DNR to prioritize and maximize electrification of vehicles under the VW settlement.

Sincerely,
Arnold Park
4400 Lindell Blvd 18P
Saint Louis, MO 63108

Carol Comer, Director, Missouri Department of Natural Resources
1101 Riverside Drive
Jefferson City, MO 65102-0176

Subject: Comments on Draft Volkswagen Settlement Plan

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Sincerely,
James Sterrett
2140 Catie Lane
Platte City, MO 64079

Carol Comer, Director, Missouri Department of Natural Resources
1101 Riverside Drive
Jefferson City, MO 65102-0176

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Sincerely,
Susan Leahy
2833 Manderly Drive
Brentwood, MO 63144

Carol Comer, Director, Missouri Department of Natural Resources
1101 Riverside Drive
Jefferson City, MO 65102-0176

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Sincerely,
Gloria Sennert
7658 Highway HH
Catawissa, MO 63015

Carol Comer, Director, Missouri Department of Natural Resources
1101 Riverside Drive
Jefferson City, MO 65102-0176

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Sincerely,
James Williams
4505 Headwood Drive APT 10
Kansas City, MO 64111

Carol Comer, Director, Missouri Department of Natural Resources
1101 Riverside Drive
Jefferson City, MO 65102-0176

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Sincerely,
Julia Hahn
4239 Barcelos Drive
Saint Louis, MO 63129

Carol Comer, Director, Missouri Department of Natural Resources
1101 Riverside Drive
Jefferson City, MO 65102-0176

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Sincerely,
Zach McDonald
1338 E Harrison St
Springfield, MO 65804

Carol Comer, Director, Missouri Department of Natural Resources
1101 Riverside Drive
Jefferson City, MO 65102-0176

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Sincerely,
Elizabeth Garcia Dominguez
18180 Rieger Rd
Wildwood, MO 63005

Carol Comer, Director, Missouri Department of Natural Resources
1101 Riverside Drive
Jefferson City, MO 65102-0176

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Sincerely,
Frank Thomeczek
4709 Pierre Street
Columbia, MO 65202

Carol Comer, Director, Missouri Department of Natural Resources
1101 Riverside Drive
Jefferson City, MO 65102-0176

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Sincerely,
Rachel Speed
990 Winter Lake Dr.
Fenton, MO 63036

Carol Comer, Director, Missouri Department of Natural Resources
1101 Riverside Drive
Jefferson City, MO 65102-0176

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Sincerely,
Alan George
3125 Alfred Ave
Saint Louis, MO 63116

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1101 Riverside Drive
Jefferson City, MO 65102-0176

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Sincerely,
Harold Ellis
3837 Castleman Avenue
Saint Louis, MO 63110

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1101 Riverside Drive
Jefferson City, MO 65102-0176

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While I am in favor of electric cars, they need to be AFFORDABLE

Sincerely,
Ange Clow
1360 Briar Creek Dr.
Saint Charles, MO 63304

Carol Comer, Director, Missouri Department of Natural Resources
1101 Riverside Drive
Jefferson City, MO 65102-0176

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Sincerely,
Joseph Kovac
5029 Lansdowne Avenue
Saint Louis, MO 63109

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1101 Riverside Drive
Jefferson City, MO 65102-0176

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Sincerely,
Charles Butler
103 Young Street
Doniphan, MO 63935

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1101 Riverside Drive
Jefferson City, MO 65102-0176

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Sincerely,
Keith Krupinski
9710 N Kenwood Ct
Kansas City, MO 64155

Carol Comer, Director, Missouri Department of Natural Resources
1101 Riverside Drive
Jefferson City, MO 65102-0176

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Sincerely,
Roberta Mullen
3502 Piranha Ct.
Columbia, MO 65202

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1101 Riverside Drive
Jefferson City, MO 65102-0176

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Sincerely,
Sarah LaBarr
21 West 10th Street 15C
Kansas City, MO 64105

Carol Comer, Director, Missouri Department of Natural Resources
1101 Riverside Drive
Jefferson City, MO 65102-0176

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Electric vehicle power is the way to improve transportation in Missouri.

Sincerely,
Kendall Brune
2339 Sportsman Hill Dr.
Cheterfield, MO 63017

Carol Comer, Director, Missouri Department of Natural Resources
1101 Riverside Drive
Jefferson City, MO 65102-0176

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Sincerely,
Hilary Noonan
4819 Holly St, Apt 2
Kansas City, MO 64112

Carol Comer, Director, Missouri Department of Natural Resources
1101 Riverside Drive
Jefferson City, MO 65102-0176

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Sincerely,
Sherri Smith
1211 W Broadway St
Webb City, MO 64870

Carol Comer, Director, Missouri Department of Natural Resources
1101 Riverside Drive
Jefferson City, MO 65102-0176

Subject: Comments on Draft Volkswagen Settlement Plan

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I urge DNR to go farther in prioritizing electrification in other vehicle categories under the VW settlement.

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DNR should also prioritize electrification of vehicles in all other categories of the settlement, such as municipal and non-government trucks and railroad switchyard trucks and locomotives. Again, this will deliver the maximum air quality benefits to people living near these sources of pollution.

Thank you for considering these comments. I urge DNR to prioritize and maximize electrification of vehicles under the VW settlement.

Sincerely,
Carrie Arquitt
3045 S. Delaware
Springfield, MO 65804

Carol Comer, Director, Missouri Department of Natural Resources
1101 Riverside Drive
Jefferson City, MO 65102-0176

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Sincerely,
Claudette Schiratti
3726 Locust St
KC, MO 64109

Carol Comer, Director, Missouri Department of Natural Resources
1101 Riverside Drive
Jefferson City, MO 65102-0176

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Sincerely,
Scott Woermann
1020 SW 13th Terrace
Lees Summit, MO 64081

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1101 Riverside Drive
Jefferson City, MO 65102-0176

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Sincerely,
John Gordon
1809 SW Summit Valley Drive
Lee's Summit, MO 64081

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1101 Riverside Drive
Jefferson City, MO 65102-0176

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Sincerely,
g harris
19 s barat
ferguson, MO 63135

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1101 Riverside Drive
Jefferson City, MO 65102-0176

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Sincerely,
TIMOTHY HUBER
2116 BROWN RD
OVERLAND, MO 63114

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1101 Riverside Drive
Jefferson City, MO 65102-0176

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Sincerely,
Rebecca Smith
4949 Wornall 413
Kansas City, MO 64112

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1101 Riverside Drive
Jefferson City, MO 65102-0176

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Sincerely,
Judy Creason
12871 Four Winds Farm
Des Peres, MO 63131

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1101 Riverside Drive
Jefferson City, MO 65102-0176

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Sincerely,
Tara Ohler-Jenney
4139 Federer St.
St. Louis, MO 63116

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1101 Riverside Drive
Jefferson City, MO 65102-0176

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Sincerely,
Rebecca McCoy
7321 NW Locust Dr
Kansas City, MO 64152

Carol Comer, Director, Missouri Department of Natural Resources
1101 Riverside Drive
Jefferson City, MO 65102-0176

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Sincerely,
Adrian White
1175 Mill Crossing Dr., #102
Creve Coeur (St Louis), MO 0

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1101 Riverside Drive
Jefferson City, MO 65102-0176

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Provide public charging stations everywhere in Missouri

Sincerely,
Reese Forbes
4225 West Pine Blvd #14
Saint Louis, MO 63108

Carol Comer, Director, Missouri Department of Natural Resources
1101 Riverside Drive
Jefferson City, MO 65102-0176

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Sincerely,
Bob Savino
4104 Warwick Blvd. (Apt. 308)
KANSAS CITY, MO 64111

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1101 Riverside Drive
Jefferson City, MO 65102-0176

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Sincerely,
Roberta Hudlow
3865 Hartford St.
St. Louis, MO 63116

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1101 Riverside Drive
Jefferson City, MO 65102-0176

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Sincerely,
Billie Schroer
2905 Foxdale Dr
Jefferson City, MO 65109

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1101 Riverside Drive
Jefferson City, MO 65102-0176

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DEDICATE MORE OF THE \$41 MILLION VW JUDGMENT TO CLEANING UP SCHOOL BUSES AND TRANSIT BUSES. Missouri is so far behind the curve on maintaining the environment in which we live. CATCH UP!

Sincerely,
Nancy Campbell
1634 W. 51st St
Kansas City, MO 64112

Carol Comer, Director, Missouri Department of Natural Resources
1101 Riverside Drive
Jefferson City, MO 65102-0176

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This is our big chance!

Sincerely,
Mary Harris
15574 Co Rd 8240
Rolla, MO 65401

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1101 Riverside Drive
Jefferson City, MO 65102-0176

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Sincerely,
Mary West
101 W 112th St
Kansas City, MO 64114

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1101 Riverside Drive
Jefferson City, MO 65102-0176

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Sincerely,
Charles Severn
216 Almond Street
Platte City, MO 64079

Carol Comer, Director, Missouri Department of Natural Resources
1101 Riverside Drive
Jefferson City, MO 65102-0176

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We have to reduce our reliance on dirty oil. Pipelines leak, oil wells spew methane and other climate-changing substances into the air, fracking liquid is contaminating MILLIONS of gallons of clean water a day that can never be purified. We have to chan

Sincerely,
Janice Durbin
2A West 5
Fulton, MO 65251

Carol Comer, Director, Missouri Department of Natural Resources
1101 Riverside Drive
Jefferson City, MO 65102-0176

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Thank you for considering these comments. I urge DNR to prioritize and maximize electrification of vehicles under the VW settlement.

Sincerely,
Jane Farnen
4 Branchwood Rd.
Mexico, MO 65265

Carol Comer, Director, Missouri Department of Natural Resources
1101 Riverside Drive
Jefferson City, MO 65102-0176

Subject: Comments on Draft Volkswagen Settlement Plan

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Sincerely,
MARSHALL HYLTON
417 Maple st
Liberty, MO 64068

Carol Comer, Director, Missouri Department of Natural Resources
1101 Riverside Drive
Jefferson City, MO 65102-0176

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Sincerely,
Trygve Veum
916 W. Iathrop Rd
Columbia, MO 65203

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1101 Riverside Drive
Jefferson City, MO 65102-0176

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Sincerely,
Rose Coleman Campbell
118 Fairview Ave
Warrensburg, MO 64093

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1101 Riverside Drive
Jefferson City, MO 65102-0176

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Thank you for considering these comments. I urge DNR to prioritize and maximize electrification of vehicles under the VW settlement.

Our largely rural state desperately needs charging stations to permit long-distance travel!!

Sincerely,
christine harker
402 s stanford st
kirkville, MO 63501

Carol Comer, Director, Missouri Department of Natural Resources
1101 Riverside Drive
Jefferson City, MO 65102-0176

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Sincerely,
Julie Holley
226 East Bodley Ave.
Kirkwood, MO 63122

Carol Comer, Director, Missouri Department of Natural Resources
1101 Riverside Drive
Jefferson City, MO 65102-0176

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Sincerely,
Mitchell Hunt
1725 Carroll Street
St Louis, MO 63104

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1101 Riverside Drive
Jefferson City, MO 65102-0176

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Sincerely,
Michelle Schultz
44 Lake Forest Dr
St. Louis, MO 63117

Carol Comer, Director, Missouri Department of Natural Resources
1101 Riverside Drive
Jefferson City, MO 65102-0176

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Sincerely,
Patricia Shoffner
408 Newport dr
St. Peter's, MO 63376

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1101 Riverside Drive
Jefferson City, MO 65102-0176

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Sincerely,
ray cooper
3745 North Fremont
springfield, MO 65803

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1101 Riverside Drive
Jefferson City, MO 65102-0176

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Sincerely,
Herb Huebner
2066 Rurline Dr
St. Louis, MO 63146

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1101 Riverside Drive
Jefferson City, MO 65102-0176

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Thank you for considering these comments. I urge DNR to prioritize and maximize electrification of vehicles under the VW settlement.

I'm a proud electric vehicle owner. Missouri needs to embrace the future with these vehicles.

Sincerely,
Scott Britton-Mehlisch
2304 S.W. 10th St.
Lee's Summit-, MO 64081

Carol Comer, Director, Missouri Department of Natural Resources
1101 Riverside Drive
Jefferson City, MO 65102-0176

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Matt Higdon
PO Box 77
Hallsville, MO 0

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Jefferson City, MO 65102-0176

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Sincerely,
Mary Abn Kroeck
4128 West Pine
St Louis, MO 63108

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1101 Riverside Drive
Jefferson City, MO 65102-0176

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Sincerely,
Kati Guerra
6827 Fyler Ave.
St. Louis, MO 63139

Carol Comer, Director, Missouri Department of Natural Resources
1101 Riverside Drive
Jefferson City, MO 65102-0176

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Sincerely,
Edith King
PO Box 751
Columbia, MO 65205

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1101 Riverside Drive
Jefferson City, MO 65102-0176

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Sincerely,
Karren Crouch
825 W. Meyer Blvd.
Kansas City, MO 0

Carol Comer, Director, Missouri Department of Natural Resources
1101 Riverside Drive
Jefferson City, MO 65102-0176

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Sincerely,
Lara Boles
412 Echo Hill Drive
Ballwin, MO 63021

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1101 Riverside Drive
Jefferson City, MO 65102-0176

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Sincerely,
Karen Rudert
415 Dowling Drive
Perryville, MO 63775

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In many areas related to the environment and sustainability, Missouri - led by St Louis and other cities, is moving forward beautifully. Please help in your area of authority and expertise as well.

Sincerely,
James Aronson
4333 Laclede Ave, Unit E
St. Louis, MO 63108

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1101 Riverside Drive
Jefferson City, MO 65102-0176

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Thank you for considering these comments. I urge DNR to prioritize and maximize electrification of vehicles under the VW settlement.

Sincerely,
Bonnie Jakylovich
16300 SE 130th Rd
Gower, MO 64454

Carol Comer, Director, Missouri Department of Natural Resources
1101 Riverside Drive
Jefferson City, MO 65102-0176

Subject: Comments on Draft Volkswagen Settlement Plan

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Sincerely,
Paula Eaton
1011 W. 121 St.
Kansas City, MO 64145

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1101 Riverside Drive
Jefferson City, MO 65102-0176

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Sincerely,
Steven Todd
36 N Scott Rd
Cuba, MO 65453

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1101 Riverside Drive
Jefferson City, MO 65102-0176

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Cuba, MO 65453

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Sincerely,
Randy Yocum
21200-a hawk dr.
Dixon, MO 65459

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1101 Riverside Drive
Jefferson City, MO 65102-0176

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Sincerely,
Charles Phillips
1120B Rear Main
Boonville, MO 65233

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1101 Riverside Drive
Jefferson City, MO 65102-0176

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Sincerely,
Josh Kuykendall
310 Porchester Dr
Saint Louis, MO 0

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1101 Riverside Drive
Jefferson City, MO 65102-0176

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Sincerely,
Greg Campbell
314 Lyonnais
Creve Coeur, MO 63141

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1101 Riverside Drive
Jefferson City, MO 65102-0176

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Sincerely,
Jaishankar Kasthuri
1719 Bristol Ridge Ct
Chesterfield, MO 63017

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1101 Riverside Drive
Jefferson City, MO 65102-0176

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Sincerely,
Chris Thomson
11652 Larkridge Lane
St. Louis, MO 63126

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1101 Riverside Drive
Jefferson City, MO 65102-0176

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We have a history of looking for ways to improve our lives for each other. We, once again have an opportunity to advance and improve the lives of millions, while saving with more efficient transportation needs while improving the condition of the air we

Sincerely,
Dennis Winton
904 N Water St
Clinton, MO 64735

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1101 Riverside Drive
Jefferson City, MO 65102-0176

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Sincerely,
Valerie Vandiver
5032 E Concord Rd
St Louis, MO 63128

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Jefferson City, MO 65102-0176

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Sincerely,
Nathan Strickland
231 e 46th st
Kansas City, MO 64112

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1101 Riverside Drive
Jefferson City, MO 65102-0176

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Sincerely,
Nancy Schultz
728 Derby Way Dr
Wentzville, MO 63385

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1101 Riverside Drive
Jefferson City, MO 65102-0176

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Sincerely,
Jenny Gunn
8069 Greystone Lane
Bonne Terre, MO 0

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Tom Schwegler
7509 N.W. Kerns Drive
Kansas City, MO 64152

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1101 Riverside Drive
Jefferson City, MO 65102-0176

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Kerby Miller
408 W. Broadway
Columbia, MO 65203

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1101 Riverside Drive
Jefferson City, MO 65102-0176

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Carol Estey
314B N 8stret
Columbia, MO 64201

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1101 Riverside Drive
Jefferson City, MO 65102-0176

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Nancy Akerley
11610 County Road 385
Holts Summit, MO 64043

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23 Spanish Trail
St. Peters, MO 63376

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1101 Riverside Drive
Jefferson City, MO 65102-0176

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Mindy Rouff
3726 HARTFORD ST
SAINT LOUIS, MO 63116

Carol Comer, Director, Missouri Department of Natural Resources
1101 Riverside Drive
Jefferson City, MO 65102-0176

Subject: Comments on Draft Volkswagen Settlement Plan

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DNR should also prioritize electrification of vehicles in all other categories of the settlement, such as municipal and non-government trucks and railroad switchyard trucks and locomotives. Again, this will deliver the maximum air quality benefits to people living near these sources of pollution.

Thank you for considering these comments. I urge DNR to prioritize and maximize electrification of vehicles under the VW settlement.

Sincerely,
Jacqueline Berliner
12169 Trailways Dr
Saint Louis, MO 0

Carol Comer, Director, Missouri Department of Natural Resources
1101 Riverside Drive
Jefferson City, MO 65102-0176

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Sincerely,
Nathan Fisher
7330 Winchester Dr
St Louis, MO 63121

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1101 Riverside Drive
Jefferson City, MO 65102-0176

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Sincerely,
Peter Vallentyne
213 S. Glenwood Ave.
Columbia, MO 65203

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1101 Riverside Drive
Jefferson City, MO 65102-0176

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Sincerely,
Linda Wells
15827 Summer Ridge Dr.
Chesterfield, MO 63017

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1101 Riverside Drive
Jefferson City, MO 65102-0176

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Sincerely,
Mark Meinhardt
3912 Crosby Drive
Saint Louis, MO 63123

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1101 Riverside Drive
Jefferson City, MO 65102-0176

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Sincerely,
KeViN MeInHaRdT
3912 CrOsBy DrIvE
SaInT LoUiS, MO 63123

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1101 Riverside Drive
Jefferson City, MO 65102-0176

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PaMeLa MeInHaRdT
3912 CrOsBy DrIvE
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Sincerely,
Ross Hunt
10479 Canter Way
Overland, MO 63114

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1101 Riverside Drive
Jefferson City, MO 65102-0176

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Great news that Missouri will add charging stations across the state, and electrify service vehicles. Let's add electric public transport, buses, locomotives and trucks!

Sincerely,
Karen Corley
342 Larkhill Court
Saint Louis, MO 63119

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1101 Riverside Drive
Jefferson City, MO 65102-0176

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Sincerely,
Bob Shoemaker
1460 County Road 105
Fayette, MO 65248

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1101 Riverside Drive
Jefferson City, MO 65102-0176

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More money and effort should be focused on electrification of public, school and mass transit

Sincerely,
James A. Gross
P.O.Box 122
Crane, MO 65633

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1101 Riverside Drive
Jefferson City, MO 65102-0176

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Sincerely,
Rita McPherson
P.O. Box 1790
Ozark, MO 65721

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Jefferson City, MO 65102-0176

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Sincerely,
Paulette Allison
4027 Newcastle Ct
JEFFERSON CITY, MO 65109

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1101 Riverside Drive
Jefferson City, MO 65102-0176

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Sincerely,
Catherine Tucher
2646 sneakwood
Foristell, MO 63348

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Jefferson City, MO 65102-0176

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Sincerely,
Glorian McGuire
836 Mary Meadows
Saint Louis, MO 63141

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1101 Riverside Drive
Jefferson City, MO 65102-0176

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Sincerely,
Donnell Sutherland
1527 Summit View Dr
Holts Summit, MO 65043

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1101 Riverside Drive
Jefferson City, MO 65102-0176

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Lets do what is right for Missouri, electric transportation is a good answer for MO

Sincerely,
ray anderson
1349 cr 1011
auxvasse, MO 65231

Carol Comer, Director, Missouri Department of Natural Resources
1101 Riverside Drive
Jefferson City, MO 65102-0176

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Paulette Zimmerman
5254A Oleatha
St. Louis, MO 63139

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We as a world together have to change the way we use oil .Electric cars are looking at our clean future.

Sincerely,
Cynthia Strohm
5100 Bald Eagle Ct
Imperial, MO 63052

Carol Comer, Director, Missouri Department of Natural Resources
1101 Riverside Drive
Jefferson City, MO 65102-0176

Subject: Comments on Draft Volkswagen Settlement Plan

I want to thank the Missouri Department of Natural Resources for its proposal to spend \$6 million of the Volkswagen settlement fund on electric vehicle charging stations. This is an important step in revolutionizing our transportation system with clean electric cars. I also thank the DNR for its plan to spend \$2 million on electrifying airport ground equipment and forklifts. These amounts should be maintained and not reduced in DNR's final plan.

I urge DNR to go farther in prioritizing electrification in other vehicle categories under the VW settlement.

Electric vehicles are inherently cheaper than fossil fuel vehicles in terms of fuel and maintenance costs. When deciding how to spend funds in other vehicle categories, DNR should consider the cost-effectiveness of proposals over the lifetime of the vehicle. A project that electrifies a bus, for example, will have a lower lifetime cost to the transit agency or school district than switching to a newer diesel or natural gas engine. That allows funds saved on fuel and maintenance to be spent on more electric buses. That's both a wise investment of these limited funds and it maximizes public health benefits by reducing air pollution.

DNR should also prioritize electrification of vehicles in all other categories of the settlement, such as municipal and non-government trucks and railroad switchyard trucks and locomotives. Again, this will deliver the maximum air quality benefits to people living near these sources of pollution.

Thank you for considering these comments. I urge DNR to prioritize and maximize electrification of vehicles under the VW settlement.

Sincerely,
Cory Kleinschmidt
702 Landscape Ave.
St. Louis, MO 63119

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1101 Riverside Drive
Jefferson City, MO 65102-0176

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We cannot wait...We cannot go backwards...We can only go in One Direction...It is Earth's only Option. Please do the right thing.

Sincerely,
Pat Waddle
6211 Delor St
Saint Louis, MO 63109

Carol Comer, Director, Missouri Department of Natural Resources
1101 Riverside Drive
Jefferson City, MO 65102-0176

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Sincerely,
Stephen Taylor
5132 SW Surf Scooter St
Lees Summit, MO 64082

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Jefferson City, MO 65102-0176

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Sincerely,
Fran Kurtenbach
8009 N Hope Ave
Kansas City, MO 64151

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Jefferson City, MO 65102-0176

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Sincerely,
Ethan Duke
27331 Highway WW
Marshall, MO 65340

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Jefferson City, MO 65102-0176

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this is so important, please do not dismiss

Sincerely,
barbrara haffner
pebble brook ct
st. louis, MO 0

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1101 Riverside Drive
Jefferson City, MO 65102-0176

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Sincerely,
Clifford Ryffel
13423 Terra Vista Dr
St. Louis, MO 63146

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1101 Riverside Drive
Jefferson City, MO 65102-0176

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Please consider all best options in utilizing this windfall funding for improved air quality. This effort should include resisting the current administration's attempts to dismantle in place standards legislated by previous administrations. Thank You

Sincerely,
Michael Luther
2501 S Mina Ave
Joplin, MO 64804

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1101 Riverside Drive
Jefferson City, MO 65102-0176

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Sincerely,
Jim Lewis
9535 NE 100th Street
Kansas City, MO 64157

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Jefferson City, MO 65102-0176

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Sincerely,
John Bowles
27 Freeman Cemetery Road
Salem, MO 65560

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Sincerely,
Judith Braffman-Miller
1149 Partridge Avenue
Saint Louis, MO 63130

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1101 Riverside Drive
Jefferson City, MO 65102-0176

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Sincerely,
Lili Sachar
8021 Crescent Dr
St Louis, MO 63105

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Jefferson City, MO 65102-0176

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Sincerely,
Don Favier
1823 Alvarado Dr.
Fenton, MO 63026

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Jefferson City, MO 65102-0176

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Sincerely,
Loren Bodendieck
8922 Crest Oak Ln
Saint Louis, MO 63126

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Jefferson City, MO 65102-0176

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James Mori
2 Dogwood
Rolla, MO 65401

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Sincerely,
James Norris
4239 Lawn Ave 2s
Saint Louis, MO 63109

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1101 Riverside Drive
Jefferson City, MO 65102-0176

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Sincerely,
Steven King
3030 Longfellow Blvd
Saint Louis, MO 63104

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Jefferson City, MO 65102-0176

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Dennis Sommer
2447 Cripple Creek Dr.
Saint Louis, MO 63129

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1101 Riverside Drive
Jefferson City, MO 65102-0176

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Eric Martinez
375 Beckley Place
St. Charles, MO 63304

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Jean Digby
3833 Botanical
Saint Louis, MO 63110

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Sincerely,
Caitlin Meyer
4620 Salem drive
Columbia, MO 65203

Carol Comer, Director, Missouri Department of Natural Resources
1101 Riverside Drive
Jefferson City, MO 65102-0176

Subject: Comments on Draft Volkswagen Settlement Plan

I want to thank the Missouri Department of Natural Resources for its proposal to spend \$6 million of the Volkswagen settlement fund on electric vehicle charging stations. This is an important step in revolutionizing our transportation system with clean electric cars. I also thank the DNR for its plan to spend \$2 million on electrifying airport ground equipment and forklifts. These amounts should be maintained and not reduced in DNR's final plan.

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Sincerely,
Jo Coscia
6320 Alamo Ave
Clayton, MO 63105

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1101 Riverside Drive
Jefferson City, MO 65102-0176

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Thank you for considering these comments. I urge DNR to prioritize and maximize electrification of vehicles under the VW settlement.

Sincerely,
Michael Crowden
32720 SW Outer Rd
Harrisonville, MO 64701

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1101 Riverside Drive
Jefferson City, MO 65102-0176

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Sincerely,
Pete Whitridge
Rt. 5 PO Box 935
Ava, MO 65608

Carol Comer, Director, Missouri Department of Natural Resources
1101 Riverside Drive
Jefferson City, MO 65102-0176

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Thank you for considering these comments. I urge DNR to prioritize and maximize electrification of vehicles under the VW settlement.

Burning one gallon (6.25 pounds) of gasoline adds 20 pounds of carbon dioxide emissions to the atmosphere. A transition to electric power for transportation is essential.

Sincerely,
David Klassen
271 Meadow Ridge Drive
Hannibal, MO 63401

Carol Comer, Director, Missouri Department of Natural Resources
1101 Riverside Drive
Jefferson City, MO 65102-0176

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Thank you for considering these comments. I urge DNR to prioritize and maximize electrification of vehicles under the VW settlement.

This is the future. I hope MO can do the right thing with these funds.

Sincerely,
Anne Orth
PO Box 55
Gerald, MO 63037

Carol Comer, Director, Missouri Department of Natural Resources
1101 Riverside Drive
Jefferson City, MO 65102-0176

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Sincerely,
Kevin McCann
1385 Nashua Drive
Florissant, MO 63033

Carol Comer, Director, Missouri Department of Natural Resources
1101 Riverside Drive
Jefferson City, MO 65102-0176

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Looking forward to a future with alternate energy, sustainable power & clean environment.

Sincerely,
Irene Gnemi
PO Box 440
Newburg, MO 65550

Carol Comer, Director, Missouri Department of Natural Resources
1101 Riverside Drive
Jefferson City, MO 65102-0176

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Sincerely,
William DePriest
15 Pinehurst Ct.
St. Peters, MO 63376

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1101 Riverside Drive
Jefferson City, MO 65102-0176

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Sincerely,
Lonny Kramer
3313 Douglas Fir Cir
SAINT CHARLES, MO 63303

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1101 Riverside Drive
Jefferson City, MO 65102-0176

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Sincerely,
Howard Masin
813 Bordeaux Ct
Manchester, MO 63011

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1101 Riverside Drive
Jefferson City, MO 65102-0176

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Sincerely,
Mary Davis
1310 Linden dr., Apt. 221
Jefferson city, MO 65109

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1101 Riverside Drive
Jefferson City, MO 65102-0176

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Sincerely,
Carl Pandolfi
625 tuxedo blvd
St. Louis, MO 63119

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1101 Riverside Drive
Jefferson City, MO 65102-0176

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Sincerely,
Jeannie Johnson
605 WEBSTER ST
Harrisonville, MO 64701

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1101 Riverside Drive
Jefferson City, MO 65102-0176

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Sincerely,
Donald Buckshot
187 Marshall DR
Wentzville, MO 63385

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1101 Riverside Drive
Jefferson City, MO 65102-0176

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Sincerely,
Louise schaper
987,Claygate Court
Ballwin, MO 0

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1101 Riverside Drive
Jefferson City, MO 65102-0176

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Sincerely,
Tim Butters
934 Hwy TT
Bates City, MO 0

Carol Comer, Director, Missouri Department of Natural Resources
1101 Riverside Drive
Jefferson City, MO 65102-0176

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Thank you for considering these comments. I urge DNR to prioritize and maximize electrification of vehicles under the VW settlement.

I drive a hybrid vehicle myself.

Sincerely,
Scott Crawford
9355 E. 69th St.
Raytown, MO 64133

Carol Comer, Director, Missouri Department of Natural Resources
1101 Riverside Drive
Jefferson City, MO 65102-0176

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Sincerely,
Kirk Barnett
5254 Fairview Ave
St. Louis, MO 63139

Carol Comer, Director, Missouri Department of Natural Resources
1101 Riverside Drive
Jefferson City, MO 65102-0176

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Sincerely,
Kathe Quigley
1534 Froesel Dr
Ellisville, MO 63011

Carol Comer, Director, Missouri Department of Natural Resources
1101 Riverside Drive
Jefferson City, MO 65102-0176

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Sincerely,
Kathleen Dolson
8340 Knollwood Dr
Saint Louis, MO 63121

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1101 Riverside Drive
Jefferson City, MO 65102-0176

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DNR should also prioritize electrification of vehicles in all other categories of the settlement, such as municipal and non-government trucks and railroad switchyard trucks and locomotives. Again, this will deliver the maximum air quality benefits to people living near these sources of pollution.

Thank you for considering these comments. I urge DNR to prioritize and maximize electrification of vehicles under the VW settlement.

Sincerely,
Barbara Seematter
322 South Hanley Rd
Clayton, MO 63105

Carol Comer, Director, Missouri Department of Natural Resources
1101 Riverside Drive
Jefferson City, MO 65102-0176

Subject: Comments on Draft Volkswagen Settlement Plan

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Sincerely,
Elizabeth Montes
1800 E Boonville St
Sedalia, MO 65301

Carol Comer, Director, Missouri Department of Natural Resources
1101 Riverside Drive
Jefferson City, MO 65102-0176

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Sincerely,
Shirley Ferguson
8675 Rosalie Ave.
St. Louis, MO 63144

Carol Comer, Director, Missouri Department of Natural Resources
1101 Riverside Drive
Jefferson City, MO 65102-0176

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Thank you for considering these comments. I urge DNR to prioritize and maximize electrification of vehicles under the VW settlement.

Electric cars are the next "cool" thing!!

Sincerely,
Denise Motta
8038 Mackenzie Rd.
St. Louis, MO 63123

Carol Comer, Director, Missouri Department of Natural Resources
1101 Riverside Drive
Jefferson City, MO 65102-0176

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Better air quality means healthier Missourians!

Sincerely,
Mary Cornell
5635 Waterman Blvd Apt 12
Saint Louis, MO 63112

Carol Comer, Director, Missouri Department of Natural Resources
1101 Riverside Drive
Jefferson City, MO 65102-0176

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Sincerely,
Michael McBride
441 Hill Trl
Ballwin, MO 63011

Carol Comer, Director, Missouri Department of Natural Resources
1101 Riverside Drive
Jefferson City, MO 65102-0176

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Sincerely,
Carolyn Ryan
12716 Karenway Ct.
St. Louis, MO 63146

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1101 Riverside Drive
Jefferson City, MO 65102-0176

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Sincerely,
Sharon Langdon
2800 Green Valley Drive
Columbia, MO 65201

Carol Comer, Director, Missouri Department of Natural Resources
1101 Riverside Drive
Jefferson City, MO 65102-0176

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Sincerely,
Holly Goodrich
5536 Poinciana Blvd
St Louis, MO 63123

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1101 Riverside Drive
Jefferson City, MO 65102-0176

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Thank you for considering these comments. I urge DNR to prioritize and maximize electrification of vehicles under the VW settlement.

Be on the right side of history--if you want to have a history! Spend all of this windfall on electric government vehicles and public electric infrastructure.

Sincerely,
Jay Zelenka
1017 Allen Ave, 3rd Floor
SAINT LOUIS, MO 63104

Carol Comer, Director, Missouri Department of Natural Resources
1101 Riverside Drive
Jefferson City, MO 65102-0176

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Sincerely,
Marina Laser
2900 Booth Ave
Kansas City, MO 64129

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1101 Riverside Drive
Jefferson City, MO 65102-0176

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Sincerely,
Carol Powers
4901 Wornall Road, #706
Kansas city, MO 64112

Carol Comer, Director, Missouri Department of Natural Resources
1101 Riverside Drive
Jefferson City, MO 65102-0176

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Sincerely,
Rachel Wortham
6600 Washington Avenue
St. Louis, MO 63130

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1101 Riverside Drive
Jefferson City, MO 65102-0176

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Thank you for considering these comments. I urge DNR to prioritize and maximize electrification of vehicles under the VW settlement.

We need infrastructure and broad support for electrical vehicles to benefit clean energy and clean air ASAP.

Sincerely,
Vic Myers
4508 Mexico Gravel Rd.
Columbia, MO 65202

Carol Comer, Director, Missouri Department of Natural Resources
1101 Riverside Drive
Jefferson City, MO 65102-0176

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Sincerely,
Sharon Carder-Jackson
1504 Reed Court
Excelsior Springs, MO 64024

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1101 Riverside Drive
Jefferson City, MO 65102-0176

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Thank you for considering these comments. I urge DNR to prioritize and maximize electrification of vehicles under the VW settlement.

Thank you for considering this important MO environmental work.

Sincerely,
Christine Lakey
6433 Lloyd
St. Louis, MO 63139

Carol Comer, Director, Missouri Department of Natural Resources
1101 Riverside Drive
Jefferson City, MO 65102-0176

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Sincerely,
Susan Allman
1001 Sherbrooke Rd
St. Charles, MO 63303

Carol Comer, Director, Missouri Department of Natural Resources
1101 Riverside Drive
Jefferson City, MO 65102-0176

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Sincerely,
Kevin Thompson
5318A Lansdowne Avenue
St Louis, MO 63109

Carol Comer, Director, Missouri Department of Natural Resources
1101 Riverside Drive
Jefferson City, MO 65102-0176

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Sincerely,
Brandon Menke
1958 HWY B
Berger, MO 63014

Carol Comer, Director, Missouri Department of Natural Resources
1101 Riverside Drive
Jefferson City, MO 65102-0176

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Sincerely,
Carleen Reck
814 Point Dr.
St. Louis, MO 63125

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1101 Riverside Drive
Jefferson City, MO 65102-0176

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Sincerely,
Janice Hughes
715 Armour Rd., Apt. 815
North Kansas City, MO 0

Carol Comer, Director, Missouri Department of Natural Resources
1101 Riverside Drive
Jefferson City, MO 65102-0176

Subject: Comments on Draft Volkswagen Settlement Plan

I want to thank the Missouri Department of Natural Resources for its proposal to spend \$6 million of the Volkswagen settlement fund on electric vehicle charging stations. This is an important step in revolutionizing our transportation system with clean electric cars. I also thank the DNR for its plan to spend \$2 million on electrifying airport ground equipment and forklifts. These amounts should be maintained and not reduced in DNR's final plan.

I urge DNR to go farther in prioritizing electrification in other vehicle categories under the VW settlement.

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DNR should also prioritize electrification of vehicles in all other categories of the settlement, such as municipal and non-government trucks and railroad switchyard trucks and locomotives. Again, this will deliver the maximum air quality benefits to people living near these sources of pollution.

Thank you for considering these comments. I urge DNR to prioritize and maximize electrification of vehicles under the VW settlement.

Sincerely,
JOHN GLEBS
3868 BLOW STREET
SAINT LOUIS, MO 63116

Carol Comer, Director, Missouri Department of Natural Resources
1101 Riverside Drive
Jefferson City, MO 65102-0176

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Sincerely,
Agnes Hollifield
11 Lenox Place
St Louis, MO 63108

Carol Comer, Director, Missouri Department of Natural Resources
1101 Riverside Drive
Jefferson City, MO 65102-0176

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I would love to leave a smaller personal footprint.

Sincerely,
marla hillier
3000 arlmont
st louis, MO 63121

Carol Comer, Director, Missouri Department of Natural Resources
1101 Riverside Drive
Jefferson City, MO 65102-0176

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Sincerely,
Carole Mehl
206 Westover Road
Kansas City, MO 64113

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1101 Riverside Drive
Jefferson City, MO 65102-0176

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Sincerely,
Rick Thompson
31 nw 102nd st
Kansas City, MO 64155

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1101 Riverside Drive
Jefferson City, MO 65102-0176

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Sincerely,
becky kurth
1039 Center Rd
Ozark, MO 65721

Carol Comer, Director, Missouri Department of Natural Resources
1101 Riverside Drive
Jefferson City, MO 65102-0176

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Please don't waste the energy money the way the tobacco money was spent.

Sincerely,
Harold Dickherber
1420 e Georgetown loop
Columbia, MO 65203

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1101 Riverside Drive
Jefferson City, MO 65102-0176

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Sincerely,
David Clare
2641 Louis Ave.
Brentwood, MO 63144

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1101 Riverside Drive
Jefferson City, MO 65102-0176

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Sincerely,
Joan M Oliver
1235 Cedar Ridge Drive
Saint Louis, MO 63146

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1101 Riverside Drive
Jefferson City, MO 65102-0176

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Sincerely,
Joan Wilson
351 Academy St.
Ste. Genevieve, MO 63670

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Jefferson City, MO 65102-0176

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Sincerely,
Connie Njust
2117 S Delaware Ave
Springfield, MO 65804

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Jefferson City, MO 65102-0176

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Greg Meyer
5704 Potomac
St. Louis, MO 63139

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Sincerely,
Cathryn Sakiyama
216 San Angelo Dr
Chesterfield, MO 63017

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1101 Riverside Drive
Jefferson City, MO 65102-0176

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Sincerely,
Sister Carol Boschert
206 N. Main, #312
O'Fallon,, MO 63366

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1101 Riverside Drive
Jefferson City, MO 65102-0176

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Sincerely,
Kathleen Shea
7008 Tulane Ave
Saint Louis, MO 63103

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1101 Riverside Drive
Jefferson City, MO 65102-0176

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Sincerely,
Palmeta Baier
29330 Lake Way
Kirksville, MO 63501

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1101 Riverside Drive
Jefferson City, MO 65102-0176

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Sincerely,
Patricia Claytor
365 Calvert Ave
Webster Groves, MO 63119

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1101 Riverside Drive
Jefferson City, MO 65102-0176

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I have owned a Leaf since 2012, charging it from solar panels on our roof. It has been a most satisfying experience. Electric vehicles are great. Please do everything possible to speed their universal adoption throughout Missouri.

Sincerely,
Jim Young
905 Lami St.
St. Louis, MO 63104

Carol Comer, Director, Missouri Department of Natural Resources
1101 Riverside Drive
Jefferson City, MO 65102-0176

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Sincerely,
Annette Hopkins
9109 Grant Park Drv.
St. Louis, MO 63123

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1101 Riverside Drive
Jefferson City, MO 65102-0176

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Joseph Sims
4563 Loughborough Ave
Saint Louis, MO 63116

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1101 Riverside Drive
Jefferson City, MO 65102-0176

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Mo could be a leader in clean energy, let's make this happen!

Sincerely,
MICHELE ISAM
4020 DELOR
SAINT LOUIS, MO 63116

Carol Comer, Director, Missouri Department of Natural Resources
1101 Riverside Drive
Jefferson City, MO 65102-0176

Subject: Comments on Draft Volkswagen Settlement Plan

I want to thank the Missouri Department of Natural Resources for its proposal to spend \$6 million of the Volkswagen settlement fund on electric vehicle charging stations. This is an important step in revolutionizing our transportation system with clean electric cars. I also thank the DNR for its plan to spend \$2 million on electrifying airport ground equipment and forklifts. These amounts should be maintained and not reduced in DNR's final plan.

I urge DNR to go farther in prioritizing electrification in other vehicle categories under the VW settlement.

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DNR should also prioritize electrification of vehicles in all other categories of the settlement, such as municipal and non-government trucks and railroad switchyard trucks and locomotives. Again, this will deliver the maximum air quality benefits to people living near these sources of pollution.

Thank you for considering these comments. I urge DNR to prioritize and maximize electrification of vehicles under the VW settlement.

Sincerely,
Megan Baker
1900 W Murray Dr
Springfield, MO 65810

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1101 Riverside Drive
Jefferson City, MO 65102-0176

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Sincerely,
Allan Childs
15400 Highway 187
Eureka Springs, MO 72631

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Jefferson City, MO 65102-0176

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Sincerely,
Steve Conrad
1711 Concord Court
Kansas City, MO 64110

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1101 Riverside Drive
Jefferson City, MO 65102-0176

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Sincerely,
Marty Koenig
3908 Juniata St
Saint Louis, MO 63116

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1101 Riverside Drive
Jefferson City, MO 65102-0176

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Sincerely,
patrick scarry
9 treeline dr.
o'fallon, MO 63366

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1101 Riverside Drive
Jefferson City, MO 65102-0176

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Sincerely,
John Moszyk
4278 Bordeaux
St Louis, MO 63129

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Sincerely,
Kevin Allemann
6780 W Bruce Lane
Harrisburg, MO 0

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Sincerely,
Patricia Ferguson
3501 Huntington Lane
St. Charles, MO 63303

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Eileen Mcmanus
5426 Holmes St
Kansas city, MO 64110

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Sincerely,
Kent Johnson
12928 MIDFIELD TERRACE
ST LOUIS, MO 63146

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1101 Riverside Drive
Jefferson City, MO 65102-0176

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Sincerely,
Keith Balzer
10367 Corbeil Unit A
Saint Louis, MO 63146

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Electric vehicles are a logical, practical solution to a pollution problem that isn't going away and that we need to address now.

Sincerely,
Lany Clough
972 Chestnut Ridge Road
Manchester, MO 63021

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1101 Riverside Drive
Jefferson City, MO 65102-0176

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Alex Dayoub
10535 N Marsh Ave
Kansas City, MO 64157

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Sincerely,
Linda Kurz
7425 Hwy FF
Lonedell, MO 63060

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Sincerely,
Kurt Kessner
1 Dancing Rabbit LN, Box 3
Rutledge, MO 63563

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1101 Riverside Drive
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Sincerely,
Ellen Egel
412 County Hills Dr
Saint Louis, MO 63119

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Sincerely,
Melissa Nigh
1203 Vine Street
Fulton, MO 65251

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Some money could possibly be used also to eliminate diesel school and city buses.

Sincerely,
Stephen W. Skrainka
7170 Washington Ave.
University City, MO, MO 0

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1101 Riverside Drive
Jefferson City, MO 65102-0176

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Sincerely,
sara hopewell
7348 Main
kansas city, MO 64114

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Maureen Hoessle
2103 Princeton Place
St. Louis, MO 63117

Carol Comer, Director, Missouri Department of Natural Resources
1101 Riverside Drive
Jefferson City, MO 65102-0176

Subject: Comments on Draft Volkswagen Settlement Plan

I want to thank the Missouri Department of Natural Resources for its proposal to spend \$6 million of the Volkswagen settlement fund on electric vehicle charging stations. This is an important step in revolutionizing our transportation system with clean electric cars. I also thank the DNR for its plan to spend \$2 million on electrifying airport ground equipment and forklifts. These amounts should be maintained and not reduced in DNR's final plan.

I urge DNR to go farther in prioritizing electrification in other vehicle categories under the VW settlement.

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DNR should also prioritize electrification of vehicles in all other categories of the settlement, such as municipal and non-government trucks and railroad switchyard trucks and locomotives. Again, this will deliver the maximum air quality benefits to people living near these sources of pollution.

Thank you for considering these comments. I urge DNR to prioritize and maximize electrification of vehicles under the VW settlement.

Sincerely,
Robert Reeves
1841 Niemann
Cape Girardeau, MO 63702

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Sincerely,
Robert Swearingen
3864 Hartford
Saint Louis, MO 63116

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Don't forget that electric vehicles are also much quieter--making for a more relaxing environment and enabling easier conversation and collaboration for the passengers, and less disruption for the many people into whose environment the vehicles will intrude.

Sincerely,
Edward Gentzler
420 S Kirkwood Rd Apt 239
Kirkwood, MO 63122

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Jefferson City, MO 65102-0176

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Sincerely,
Annaleah Brown
6310 NW Waukomis Dr
Kansas City, MO 64151

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Thank you for considering these comments. I urge DNR to prioritize and maximize electrification of vehicles under the VW settlement.

I own a fully electric vehicle and would love more charging options around the state, especially at state parks & historic sites!

Sincerely,
Beth Horton
6631 Michigan Ave
St Louis, MO 63111

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1101 Riverside Drive
Jefferson City, MO 65102-0176

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Sincerely,
Elizabeth Hoscheid
307 Woodwind Ct
Kirksville, MO 63501

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Sincerely,
Jim Magill
19209 N. Rt. V
Sturgeon, MO 65284

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Sincerely,
Cindy Gross
3137 Allen Avenue
St Louis, MO 63104

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This is a GREAT opportunity - for our state, for our future generations of Missourians, for the sustainable future of our environment. PLEASE DO THE RIGHT THING FOR MISSOURI and use this windfall money to the benefit of future generations ... and for the

Sincerely,
Douglas K Miller
617 N. Woodlawn Ave
Kirkwood, MO 63121

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Jefferson City, MO 65102-0176

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Aaron Hailey
1265 W Central
Oronogo, MO 64855

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Michael Baalman
2555 McClay Gardens
ST. Peters, MO 63376

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Sincerely,
Mary Rich
1235 Nancy Jo Pl
Saint Louis, MO 0

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Sincerely,
Barbara Smith
8753 Nw 294 St
Gower, MO 64454

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Let's clean up our automobile pollution now!

Sincerely,
Laura Gorman
6107 McPherson
St. Louis, MO 63112

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Jefferson City, MO 65102-0176

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Sincerely,
Donna Springer
5931 Suson Place
St. Louis, MO 63139

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Jefferson City, MO 65102-0176

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Sincerely,
Francine Glass
8737 Villa Crest Dr
St. Louis, MO 63126

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Sincerely,
Colton Vance

St Charles, MO 63303

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Sincerely,
Mark Haim
1402 Richardson St.
Columbia, MO 65201

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Jefferson City, MO 65102-0176

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Sincerely,
tracy holthaus
8115 nw 81st ct
kansas city, MO 64152

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1101 Riverside Drive
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Thank you for your leadership

Sincerely,
Elizabeth Rieman
405 S. Garth
Columbia, MO 65201

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Thank you for considering these comments. I urge DNR to prioritize and maximize electrification of vehicles under the VW settlement.

Sincerely,
Janet Csolak
1215 Elm Drive
Webster Groves, MO 63119

Carol Comer, Director, Missouri Department of Natural Resources
1101 Riverside Drive
Jefferson City, MO 65102-0176

Subject: Comments on Draft Volkswagen Settlement Plan

I want to thank the Missouri Department of Natural Resources for its proposal to spend \$6 million of the Volkswagen settlement fund on electric vehicle charging stations. This is an important step in revolutionizing our transportation system with clean electric cars. I also thank the DNR for its plan to spend \$2 million on electrifying airport ground equipment and forklifts. These amounts should be maintained and not reduced in DNR's final plan.

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Sincerely,
Kenneth Robertson
8315 NW Waukomis Drive
Kansas City, MO 64151

Carol Comer, Director, Missouri Department of Natural Resources
1101 Riverside Drive
Jefferson City, MO 65102-0176

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Sincerely,
Frances Clifford
5461 Legend Ct
Weldon Spring, MO 63304

Carol Comer, Director, Missouri Department of Natural Resources
1101 Riverside Drive
Jefferson City, MO 65102-0176

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Sincerely,
Amy Reed
3301 Cambridge ave
Maplewood, MO 63143

Carol Comer, Director, Missouri Department of Natural Resources
1101 Riverside Drive
Jefferson City, MO 65102-0176

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Sincerely,
Matthew Struckhoff
113 Park Hill Ave
Columbia, MO 65203

Carol Comer, Director, Missouri Department of Natural Resources
1101 Riverside Drive
Jefferson City, MO 65102-0176

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Sincerely,
Kelsey Coon
619 94th
Kansas City, MO 64155

Carol Comer, Director, Missouri Department of Natural Resources
1101 Riverside Drive
Jefferson City, MO 65102-0176

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We love our Nissan leaf.

Sincerely,
Michelle Rose
1512 Ensley Circle
Raymore, MO 64083

Carol Comer, Director, Missouri Department of Natural Resources
1101 Riverside Drive
Jefferson City, MO 65102-0176

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Sincerely,
Bruce D Burleigh
608 Imperial Drive
O'Fallon, MO 63366

Carol Comer, Director, Missouri Department of Natural Resources
1101 Riverside Drive
Jefferson City, MO 65102-0176

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Sincerely,
Lea Koesterer
4121 West Pine Blvd.
Saint Louis, MO 63108

Carol Comer, Director, Missouri Department of Natural Resources
1101 Riverside Drive
Jefferson City, MO 65102-0176

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Sincerely,
Thomas Sanger
4346 Juniata St
St Louis, MO 63116

Carol Comer, Director, Missouri Department of Natural Resources
1101 Riverside Drive
Jefferson City, MO 65102-0176

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Sincerely,
Robert Haslag
10513 Bryant Rd
Centertown, MO 65023

Carol Comer, Director, Missouri Department of Natural Resources
1101 Riverside Drive
Jefferson City, MO 65102-0176

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Thank you for considering these comments. I urge DNR to prioritize and maximize electrification of vehicles under the VW settlement.

Basically, whatever you can do to minimize contaminating our air will be much appreciated.

Sincerely,
Cynthia Hobart
P. O. Box 307
Rolla, MO 65402

Carol Comer, Director, Missouri Department of Natural Resources
1101 Riverside Drive
Jefferson City, MO 65102-0176

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Sincerely,
Carol Pufalt
7530 Delmar
St Louis, MO 63130

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1101 Riverside Drive
Jefferson City, MO 65102-0176

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Thank you for considering these comments. I urge DNR to prioritize and maximize electrification of vehicles under the VW settlement.

This money came from a settlement against a company because they were polluting the air. It should be used to clean the air.

Sincerely,
Daniel Berg
-455 Gregg Ave
Saint Louis, MO 63139

Carol Comer, Director, Missouri Department of Natural Resources
1101 Riverside Drive
Jefferson City, MO 65102-0176

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Thank you for considering these comments. I urge DNR to prioritize and maximize electrification of vehicles under the VW settlement.

I drive a 2017 Chevy Volt

Sincerely,
Rudy Smith
240 Millridge Dr.
Moscow Mills, MO 63362

Carol Comer, Director, Missouri Department of Natural Resources
1101 Riverside Drive
Jefferson City, MO 65102-0176

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I drive a Nissan Leaf. EVs are thrifty.

Sincerely,
James R Turner
301 W110th St
Kansas City, MO 64114

Carol Comer, Director, Missouri Department of Natural Resources
1101 Riverside Drive
Jefferson City, MO 65102-0176

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Sincerely,
Julie Rusciolelli-Campbell
12316 Tempo Dr
Saint Louis, MO 0

Carol Comer, Director, Missouri Department of Natural Resources
1101 Riverside Drive
Jefferson City, MO 65102-0176

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Thank you for considering these comments. I urge DNR to prioritize and maximize electrification of vehicles under the VW settlement.

It is time for Missouri to become an environmental leader in clean energy.

Sincerely,
Patricia Jones-Stahnke
501 Huntington Trails Drive
Festus, MO 63028

Carol Comer, Director, Missouri Department of Natural Resources
1101 Riverside Drive
Jefferson City, MO 65102-0176

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Thank you for considering these comments. I urge DNR to prioritize and maximize electrification of vehicles under the VW settlement.

The sooner we make the transition to electric cars the better. Let's not be left behind!

Sincerely,
carleton stock
15 S. Schlueter Avenue
Dellwood, MO 63135

Carol Comer, Director, Missouri Department of Natural Resources
1101 Riverside Drive
Jefferson City, MO 65102-0176

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Sincerely,
Elise McCoubrie
15 Fawn Valley Cir
Saint Peters, MO 63376

Carol Comer, Director, Missouri Department of Natural Resources
1101 Riverside Drive
Jefferson City, MO 65102-0176

Subject: Comments on Draft Volkswagen Settlement Plan

I want to thank the Missouri Department of Natural Resources for its proposal to spend \$6 million of the Volkswagen settlement fund on electric vehicle charging stations. This is an important step in revolutionizing our transportation system with clean electric cars. I also thank the DNR for its plan to spend \$2 million on electrifying airport ground equipment and forklifts. These amounts should be maintained and not reduced in DNR's final plan.

I urge DNR to go farther in prioritizing electrification in other vehicle categories under the VW settlement.

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DNR should also prioritize electrification of vehicles in all other categories of the settlement, such as municipal and non-government trucks and railroad switchyard trucks and locomotives. Again, this will deliver the maximum air quality benefits to people living near these sources of pollution.

Thank you for considering these comments. I urge DNR to prioritize and maximize electrification of vehicles under the VW settlement.

Sincerely,
Jessica Whitfield
3824 Bell St
Kansas City, MO 64111

Carol Comer, Director, Missouri Department of Natural Resources
1101 Riverside Drive
Jefferson City, MO 65102-0176

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Electric cars are the future of transportation. Independence from fossil fuels is a resulting benefit of expanding their use. With the resources available now, now is the time to move forward.

Sincerely,
Margaret McFarlin
405 Dean Ave
Ava, MO 65608

Carol Comer, Director, Missouri Department of Natural Resources
1101 Riverside Drive
Jefferson City, MO 65102-0176

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Be smart...invest in the future!

Sincerely,
Jeff Witt
7519 Stateline Road
Kansas City, MO 64114

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1101 Riverside Drive
Jefferson City, MO 65102-0176

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Sincerely,
Julie Roedel
1041 N Clay
Kirkwood, MO 63122

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1101 Riverside Drive
Jefferson City, MO 65102-0176

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Sincerely,
Judith Oge
4961 Pernod
St. Louis, MO 63109

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1101 Riverside Drive
Jefferson City, MO 65102-0176

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Sincerely,
Jack Andrews
1605 Spiros Dr. Apt. A
Columbia, MO 65202

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1101 Riverside Drive
Jefferson City, MO 65102-0176

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Sincerely,
Matthew Lane
12798 Wynfield Pines Ct.
Des Peres, MO 63131

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Jefferson City, MO 65102-0176

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Ittikorn Meeboonlue
212 Edgar
St.Louis, MO 63119

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Sandra Liberty
7409 N Donnelly Ave
Kansas City, MO 64158

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Sincerely,
Rick Menendez
2175 Wilderness Trl
Barnhart, MO 63012

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Jefferson City, MO 65102-0176

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Sincerely,
Catherine Goser
P O Box 6036
Fulton, MO 65251

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Providing option for safe travel, for all forms of transportation

Sincerely,
Robert Ridgeway
2541 Union Road
Saint Louis, MO 0

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1101 Riverside Drive
Jefferson City, MO 65102-0176

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Harold Watson
1930 E. Cairo
Springfield, MO 65802

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Sincerely,
Linda Cummings
2533 Trossock Lane
St. Louis, MO 63122

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Sincerely,
Rachel Roberts
23 Warson Terrace
St Louis, MO 63124

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Jefferson City, MO 65102-0176

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WE MUST MAKE CHANGES NOW!!! AMERICA IS SO PRIMITIVE!

Sincerely,
Charles GEARHART
15113 E. TRUMAN RD.
INDEPENDENCE, MO 64050

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1101 Riverside Drive
Jefferson City, MO 65102-0176

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P Ronat
4490 S Sycamore
Springfield, MO 65810

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Jefferson City, MO 65102-0176

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F Debbie Campbell
7532 Lovella Ave
St Louis, MO 63117

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Dawn Sperry Allen
RR 1 Box 19580
Patterson, MO 63956

Carol Comer, Director, Missouri Department of Natural Resources
1101 Riverside Drive
Jefferson City, MO 65102-0176

Subject: Comments on Draft Volkswagen Settlement Plan

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I urge DNR to go farther in prioritizing electrification in other vehicle categories under the VW settlement.

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DNR should also prioritize electrification of vehicles in all other categories of the settlement, such as municipal and non-government trucks and railroad switchyard trucks and locomotives. Again, this will deliver the maximum air quality benefits to people living near these sources of pollution.

Thank you for considering these comments. I urge DNR to prioritize and maximize electrification of vehicles under the VW settlement.

Sincerely,
Robbie Engel
8 Westwood Dr.
East Tawas, MO 48730

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Sincerely,
Stephanie Kelly
204 E 75th St
Kansas City, MO 64114

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Sincerely,
Sarah Newman
54 Burgundy Drive
Lake Saint Louis, MO 63367

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For my part, I am hoping my next vehicle will be an electric one. That will be dependent on an increase in the availability of charging stations.

Sincerely,
Cynthia Andre
1829 Columbine Rd
Ozark, MO 0

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Jefferson City, MO 65102-0176

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Sincerely,
Shirley Pullen
RR2 Box 6530
Doniphan, MO 63935

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Sincerely,
Michael Olenjack
6515 Winona Avenue
Saint Louis, MO 63109

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Sincerely,
Susan Zornek-Stevens
15285 State Hwy AA
Potosi, MO 63664

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Sincerely,
Vicki Hightower
1652 NW 785TH RD
BATES CITY, MO 64011

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1101 Riverside Drive
Jefferson City, MO 65102-0176

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Sincerely,
Brian Smith
702 Warrior Pass
Warrenton, MO 63383

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Sincerely,
Barbara Macke
3613 Saint Gregory Ln
Saint Ann, MO 63074

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Matthew Reker
1007 N Brampton Dr
Saint Charles, MO 63304

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This is the future and Missouri can lead the way to a cheaper (in the long run) healthier world!!

Sincerely,
Julia Richter
11662 Holly Springs Drive
St. Louis, MO 0

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Karen Cain
1536 Oak Lei Drive
Cape Girardeau, MO 63701

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Janice Starke
4104 Chapel Hill Spur
Sullivan, MO 63080

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Sincerely,
carrie luce
6000 North Main Street
Gladstone, MO 64118

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More electric vehicles means cleaner air.

Sincerely,
John Hickey
532 Mason Ave.
St. Louis, MO 63119

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Steven Carrell
7830 NW 100th St
Kansas City, MO 64153

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Jefferson City, MO 65102-0176

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Jean Peterson
1078 Brooksgate Manor
Kirkwood, MO 63122

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Sincerely,
Nikolas Chkautovich
2062 Meramec Meadows Dr.
Fenton, MO 63026

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Jo Ann Sharrie Hawkins
40 Lovers Lane
Reeds Spring, MO 65737

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Sincerely,
Sarah Willey
1125 St. Bernadette Ln.
Florissant, MO 63031

Carol Comer, Director, Missouri Department of Natural Resources
1101 Riverside Drive
Jefferson City, MO 65102-0176

Subject: Comments on Draft Volkswagen Settlement Plan

I want to thank the Missouri Department of Natural Resources for its proposal to spend \$6 million of the Volkswagen settlement fund on electric vehicle charging stations. This is an important step in revolutionizing our transportation system with clean electric cars. I also thank the DNR for its plan to spend \$2 million on electrifying airport ground equipment and forklifts. These amounts should be maintained and not reduced in DNR's final plan.

I urge DNR to go farther in prioritizing electrification in other vehicle categories under the VW settlement.

Electric vehicles are inherently cheaper than fossil fuel vehicles in terms of fuel and maintenance costs. When deciding how to spend funds in other vehicle categories, DNR should consider the cost-effectiveness of proposals over the lifetime of the vehicle. A project that electrifies a bus, for example, will have a lower lifetime cost to the transit agency or school district than switching to a newer diesel or natural gas engine. That allows funds saved on fuel and maintenance to be spent on more electric buses. That's both a wise investment of these limited funds and it maximizes public health benefits by reducing air pollution.

DNR should also prioritize electrification of vehicles in all other categories of the settlement, such as municipal and non-government trucks and railroad switchyard trucks and locomotives. Again, this will deliver the maximum air quality benefits to people living near these sources of pollution.

Thank you for considering these comments. I urge DNR to prioritize and maximize electrification of vehicles under the VW settlement.

Sincerely,
Roger Hershey
2904 South Brentwood Court
Independence, MO 64055

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1101 Riverside Drive
Jefferson City, MO 65102-0176

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Think of your Grandchildren.

Sincerely,
Karen monroe
2351 County Road 336
Redford, MO 63665

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1101 Riverside Drive
Jefferson City, MO 65102-0176

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Sincerely,
Shannon Lefler
406 West Adams Apt J
Kirkwood, MO 63122

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1101 Riverside Drive
Jefferson City, MO 65102-0176

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Sincerely,
Gretchen Waddell Barwick
1400 McCausland Ave
St. Louis, MO 63117

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1101 Riverside Drive
Jefferson City, MO 65102-0176

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Sincerely,
Denise Hartley
3509 Bray Ave
Columbia, MO 65203

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1101 Riverside Drive
Jefferson City, MO 65102-0176

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Sincerely,
Amalie Duvall
107 E Walnut St.
Boonville, MO 65233

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Jefferson City, MO 65102-0176

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Sincerely,
H Flowers
5916 NW Walnut Creek Dr
kansas city, MO 64152

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Jefferson City, MO 65102-0176

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Sincerely,
John Helm
2815 Corral Estates
Arnold, MO 63010

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Jefferson City, MO 65102-0176

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I support actions to create cleaner air for a healthier Missouri.

Sincerely,
Kevin Kelly
6609 N Kircher Road
Columbia, MO 65202

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Jefferson City, MO 65102-0176

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I want an electric car!

Sincerely,
Rachel McCabe
213 Hidden Ln
Fenton, MO 63051

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Sincerely,
Vanessia Washburn
121 Appaloosa Trail
Saddkebrooke, MO 65630

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Sincerely,
Janice Wick
134 Femmer Dr.
Eolia, MO 63344

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Jefferson City, MO 65102-0176

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I recently purchased an EV, Bolt, and feel good as an environmentalist to be a part of the effort to limit emissions. Would love to see more advertisement promoting EV's, as well as education and increased charging station around the state. I pay an alter

Sincerely,
Cathy Webb
761 briar rd
Rogersville, MO 65742

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1101 Riverside Drive
Jefferson City, MO 65102-0176

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Sincerely,
cheryl stotts
2407 mississippi ave
joplin, MO 64804

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Jefferson City, MO 65102-0176

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Sincerely,
Laura Neuman
834 Louwen Dr.
St. Louis, MO 63124

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Jefferson City, MO 65102-0176

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Sincerely,
susie billington
5428 steeplechase dr
columbia, MO 65203

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1101 Riverside Drive
Jefferson City, MO 65102-0176

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Do the right thing.

Sincerely,
Jennifer Blaylock
5129 Eichelberger
St. Louis, MO 63019

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1101 Riverside Drive
Jefferson City, MO 65102-0176

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Sincerely,
Katie Lappe
3327 Pestalozzi
St louis, MO 63118

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Jefferson City, MO 65102-0176

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Sincerely,
Bobby Clark
5830 NE Dexter Ave.
Kansas City, MO 64119

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1101 Riverside Drive
Jefferson City, MO 65102-0176

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Thank you for considering these comments. I urge DNR to prioritize and maximize electrification of vehicles under the VW settlement.

Sincerely,
gary fiorino
120 McDonough St.. 1B
St. Charles, MO 63301

Carol Comer, Director, Missouri Department of Natural Resources
1101 Riverside Drive
Jefferson City, MO 65102-0176

Subject: Comments on Draft Volkswagen Settlement Plan

I want to thank the Missouri Department of Natural Resources for its proposal to spend \$6 million of the Volkswagen settlement fund on electric vehicle charging stations. This is an important step in revolutionizing our transportation system with clean electric cars. I also thank the DNR for its plan to spend \$2 million on electrifying airport ground equipment and forklifts. These amounts should be maintained and not reduced in DNR's final plan.

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Thank you for considering these comments. I urge DNR to prioritize and maximize electrification of vehicles under the VW settlement.

I have been driving an electric Car (Nissan Leaf) since 2012. The only problem with it is that most places you go there is no opportunity to charge the car. I urge you to put as much of this settlement money into encouraging as well as subsidising the i

Sincerely,
John Maxwell
3305 Russell Blvd.
St. Louis, MO 63104

Carol Comer, Director, Missouri Department of Natural Resources
1101 Riverside Drive
Jefferson City, MO 65102-0176

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Thank you for considering these comments. I urge DNR to prioritize and maximize electrification of vehicles under the VW settlement.

I own an electric car. It's the way of the present and the future!!

Sincerely,
Gary Oleksiw
909 Eaglesridge Ct
Wildwood, MO 63021

Carol Comer, Director, Missouri Department of Natural Resources
1101 Riverside Drive
Jefferson City, MO 65102-0176

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Sincerely,
Michael Oleksiw
157 B Chatterbird Ln
Eureka, MO 63025

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1101 Riverside Drive
Jefferson City, MO 65102-0176

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Sincerely,
Sandra Sokolik
836 Woodmoor Dr.
St. Louis, MO 63132

Carol Comer, Director, Missouri Department of Natural Resources
1101 Riverside Drive
Jefferson City, MO 65102-0176

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Sincerely,
Jeanene McGee
56588 HWY N
California, MO 65018

Carol Comer, Director, Missouri Department of Natural Resources
1101 Riverside Drive
Jefferson City, MO 65102-0176

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Sincerely,
Elinor Stock
15 S Schlueter Avenue
St Louis, MO 63135

Carol Comer, Director, Missouri Department of Natural Resources
1101 Riverside Drive
Jefferson City, MO 65102-0176

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We have this wonderful chance to make a lasting change!

Sincerely,
Crystal Barton
567 W Saddle Club RD
Fair Grove, MO 65648

Carol Comer, Director, Missouri Department of Natural Resources
1101 Riverside Drive
Jefferson City, MO 65102-0176

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Sincerely,
Melissa Mueller
1035 Florland Drive
Florissant, MO 63031

Carol Comer, Director, Missouri Department of Natural Resources
1101 Riverside Drive
Jefferson City, MO 65102-0176

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Sincerely,
John Lueders
10601 NW 79th Terrace
Weatherby Lake, MO 64152

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1101 Riverside Drive
Jefferson City, MO 65102-0176

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Sincerely,
Carol Fernandez
8236 Fendale Dr.
St. Louis, MO 63123

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1101 Riverside Drive
Jefferson City, MO 65102-0176

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Sincerely,
Kevin Farrell
1901 S Compton Ave
Saint Louis, MO 63104

Carol Comer, Director, Missouri Department of Natural Resources
1101 Riverside Drive
Jefferson City, MO 65102-0176

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Sincerely,
Charlie O'Reilly
1898 Monet Rd.
Nixa, MO 65714

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1101 Riverside Drive
Jefferson City, MO 65102-0176

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Sincerely,
Sebastian Allen
4522 N Agnes Ave
Kansas City, MO 64117

Carol Comer, Director, Missouri Department of Natural Resources
1101 Riverside Drive
Jefferson City, MO 65102-0176

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Sincerely,
Greg Leonard
1306 Jean Rae Drive
Columbia, MO 65203

Carol Comer, Director, Missouri Department of Natural Resources
1101 Riverside Drive
Jefferson City, MO 65102-0176

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Sincerely,
Carolyn Amparan
4804 Shale Oaks Avenue
Columbia, MO 65203

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1101 Riverside Drive
Jefferson City, MO 65102-0176

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Sincerely,
Anita Laskaris
2331 Kratky Road, Unit E
St. Louis, MO 63114

Carol Comer, Director, Missouri Department of Natural Resources
1101 Riverside Drive
Jefferson City, MO 65102-0176

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Sincerely,
Jessica Hoagland
8125 Pershing
Saint Louis, MO 63105

Carol Comer, Director, Missouri Department of Natural Resources
1101 Riverside Drive
Jefferson City, MO 65102-0176

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Sincerely,
Mona Vassos
4039 Charlotte St.
KANSAS CITY, MO 64110

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1101 Riverside Drive
Jefferson City, MO 65102-0176

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Sincerely,
Margaret O'Grady
7654 Natural Bridge Road
St Louis, MO 63121

Carol Comer, Director, Missouri Department of Natural Resources
1101 Riverside Drive
Jefferson City, MO 65102-0176

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Sincerely,
Ian Reed
4134 Chouteau
St. Louis, MO 63110

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1101 Riverside Drive
Jefferson City, MO 65102-0176

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DNR should also prioritize electrification of vehicles in all other categories of the settlement, such as municipal and non-government trucks and railroad switchyard trucks and locomotives. Again, this will deliver the maximum air quality benefits to people living near these sources of pollution.

Thank you for considering these comments. I urge DNR to prioritize and maximize electrification of vehicles under the VW settlement.

Sincerely,
Miles Hamilton
852 S Fremont
Springfield, MO 65804

Carol Comer, Director, Missouri Department of Natural Resources
1101 Riverside Drive
Jefferson City, MO 65102-0176

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Sincerely,
Julie Slover
3331 S
Springfield, MO 65804

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1101 Riverside Drive
Jefferson City, MO 65102-0176

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Sincerely,
Yanik Dhont
18801 E 33rd Street Ct S
Independence, MO 64057

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1101 Riverside Drive
Jefferson City, MO 65102-0176

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Sincerely,
Sydney Kindberg
4313 Booth st
Kansas City, MO 66103

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1101 Riverside Drive
Jefferson City, MO 65102-0176

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Sincerely,
Patricia Auer
1353 Westbrooke Meadows Ln
Ballwin, MO 63021

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1101 Riverside Drive
Jefferson City, MO 65102-0176

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Sincerely,
Bryan Lucore
417 W. County St.
Monett, MO 65708

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1101 Riverside Drive
Jefferson City, MO 65102-0176

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I am a stream team coordinator and electric vehicles, especially for public transit, will help keep our water clean. Please make clean air and water a priority.

Sincerely,
Jeff Holzem
1120 Moreau Dr
JEfferson CIty, MO 65101

Carol Comer, Director, Missouri Department of Natural Resources
1101 Riverside Drive
Jefferson City, MO 65102-0176

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Thank you for considering these comments. I urge DNR to prioritize and maximize electrification of vehicles under the VW settlement.

I urge you to prioritize electric buses for municipal transit systems, a particular need that would help provide cleaner air in Missouri cities.

Sincerely,
Amrita Burdick
4528 Wyoming St.
Kansas City, MO 64111

Carol Comer, Director, Missouri Department of Natural Resources
1101 Riverside Drive
Jefferson City, MO 65102-0176

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Sincerely,
Katharine Buchholtz
95 Kings Dr
Florissant, MO 63034

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Jefferson City, MO 65102-0176

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Sincerely,
David Neil
7346 Tylane Ave.
St. Louis, MO 63130

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Jefferson City, MO 65102-0176

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Sincerely,
Rebecca Rook
3915 Wyoming
St. Louis, MO 63116

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Sincerely,
Caron Allen
6160 Westminster Place
St. Louis, MO 63112

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Jefferson City, MO 65102-0176

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Sincerely,
jon kiesling
819 greeley ave
saint louis, MO 63119

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1101 Riverside Drive
Jefferson City, MO 65102-0176

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please increase charging stations in Kansas City

Sincerely,
robert moore
1010 brooklyn avenue
kansas city, MO 64127

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1101 Riverside Drive
Jefferson City, MO 65102-0176

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Sincerely,
Daniel Brush
5239 Blue Ridge BLVD
Raytown, MO 64133

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1101 Riverside Drive
Jefferson City, MO 65102-0176

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Sincerely,
Lisa Ross
8161 Kingsbury Blvd
Clayton, MO 63105

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Jefferson City, MO 65102-0176

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Sincerely,
Jamie Choler
7812 Grove Ave
Saint Louis, MO 63119

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1101 Riverside Drive
Jefferson City, MO 65102-0176

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Sincerely,
Jim Highfill
4120 Warwick Blvd Apt B
Kansas city, MO 64111

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1101 Riverside Drive
Jefferson City, MO 65102-0176

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Sincerely,
Bill Condon
41 W 58th Street
Kansas City, MO 64113

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1101 Riverside Drive
Jefferson City, MO 65102-0176

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1101 Riverside Drive
Jefferson City, MO 65102-0176

Subject: Comments on Draft Volkswagen Settlement Plan

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I urge DNR to go farther in prioritizing electrification in other vehicle categories under the VW settlement.

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DNR should also prioritize electrification of vehicles in all other categories of the settlement, such as municipal and non-government trucks and railroad switchyard trucks and locomotives. Again, this will deliver the maximum air quality benefits to people living near these sources of pollution.

Thank you for considering these comments. I urge DNR to prioritize and maximize electrification of vehicles under the VW settlement.

Sincerely,
Mitch Weber
5896 S National Drive
Parkville, MO 64152

Carol Comer, Director, Missouri Department of Natural Resources
1101 Riverside Drive
Jefferson City, MO 65102-0176

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Thank you for considering these comments. I urge DNR to prioritize and maximize electrification of vehicles under the VW settlement.

Sincerely,
Laura Stefacek
5626 Oleatha Avenue
St. Louis, MO 63139

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1101 Riverside Drive
Jefferson City, MO 65102-0176

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Sincerely,
Clay Cundiff
1790 SW Summit Valley Dr
Lee's Summit, MO 64081

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Jefferson City, MO 65102-0176

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Sincerely,
Robin Rysavy
322 South Shore Drive
Lake Winnebago, MO 64034

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1101 Riverside Drive
Jefferson City, MO 65102-0176

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Sincerely,
Jeannie Breeze
7729 Elton St.
St. Louis, MO 63123

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Jefferson City, MO 65102-0176

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Sincerely,
Terry King
615 E 74th Terrace
Kansas City, MO 64131

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1101 Riverside Drive
Jefferson City, MO 65102-0176

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Thank you!

Sincerely,
Laura Harrity
4916 Pennington
Blue Springs, MO 64015

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1101 Riverside Drive
Jefferson City, MO 65102-0176

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Sincerely,
Larry Denio
41223 Apple Lane
Monroe City, MO 63456

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1101 Riverside Drive
Jefferson City, MO 65102-0176

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Sincerely,
Denise Baker
7311 Devonshire Ave
Saint Louis, MO 63119

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1101 Riverside Drive
Jefferson City, MO 65102-0176

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Sincerely,
Vicki Cooper
217 Kerry
St Louis, MO 63119

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Gerald Shechter
5825 Rockhill Rd
Kansas City, MO 64110

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Sincerely,
Kristin Hays
6883 Timberline Dr.
House Springs, MO 63051

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Sincerely,
Miles Henke
10701 Saint Lawrence Lane
Saint Ann, MO 63074

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Sincerely,
Cathy Touney
2018 Blendon Place
Saint Louis, MO 63143

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Jefferson City, MO 65102-0176

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Sincerely,
Marlene Hebb
1012 boulevard view drive
saint joseph, MO 64503

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Jefferson City, MO 65102-0176

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Gloria Fooks
450 Park Dr
St Clair, MO 63077

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Debbie Nadolski
2920 Renick Street
Saint Joseph, MO 0

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Sincerely,
Alice Bloch
7228 Shaftesbury Ave
St Louis, MO 63130

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Sincerely,
Myrrah Gill
3931 Magnolia Avenue, Apt. #7
Saint Louis, MO 63110

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1101 Riverside Drive
Jefferson City, MO 65102-0176

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Amy Shelburn
2423 S Virginia Avenue
Springfield, MO 65807

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1101 Riverside Drive
Jefferson City, MO 65102-0176

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These transitions to new cleaner energy will create new jobs also, as we will need to install charging stations in cities and rest stops, and people will want to shop or eat while their car is recharging, so it will boost retail sales also.

Sincerely,
Jill Greer
17837 Tiger Rd
Stark City, MO 64866

Carol Comer, Director, Missouri Department of Natural Resources
1101 Riverside Drive
Jefferson City, MO 65102-0176

Subject: Comments on Draft Volkswagen Settlement Plan

I want to thank the Missouri Department of Natural Resources for its proposal to spend \$6 million of the Volkswagen settlement fund on electric vehicle charging stations. This is an important step in revolutionizing our transportation system with clean electric cars. I also thank the DNR for its plan to spend \$2 million on electrifying airport ground equipment and forklifts. These amounts should be maintained and not reduced in DNR's final plan.

I urge DNR to go farther in prioritizing electrification in other vehicle categories under the VW settlement.

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DNR should also prioritize electrification of vehicles in all other categories of the settlement, such as municipal and non-government trucks and railroad switchyard trucks and locomotives. Again, this will deliver the maximum air quality benefits to people living near these sources of pollution.

Thank you for considering these comments. I urge DNR to prioritize and maximize electrification of vehicles under the VW settlement.

Sincerely,
Lacey Alkire

Independence, MO 64057

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Jefferson City, MO 65102-0176

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Sincerely,
Frances Babb
2001 Kehrsdale Ct.
Clarkson Valley, MO 63005

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1101 Riverside Drive
Jefferson City, MO 65102-0176

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Electric vehicles stand to revolutionize the way we drive, decrease our dependence on foreign oil, and reduce air pollution that affects children, the elderly and people with asthma and other lung diseases. Electric vehicles emit less carbon pollution than

Sincerely,
Terry Zenser
1200 DUNLOE RD
BALLWIN, MO 63021

Carol Comer, Director, Missouri Department of Natural Resources
1101 Riverside Drive
Jefferson City, MO 65102-0176

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Sincerely,
Rev. Rodrick Burton
16060 Meadow Oak Drive
Chesterfield, MO 63017

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1101 Riverside Drive
Jefferson City, MO 65102-0176

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Sincerely,
Virginia Flynn
6561 BRADLEY AVE
Saint Louis, MO 63139

Carol Comer, Director, Missouri Department of Natural Resources
1101 Riverside Drive
Jefferson City, MO 65102-0176

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Sincerely,
Norma Neilson
9115 East 57th Terrace
Raytown, MO 64133

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1101 Riverside Drive
Jefferson City, MO 65102-0176

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Sincerely,
Naomi Chanen
371 Southwoods Way
Branson, MO 65616

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1101 Riverside Drive
Jefferson City, MO 65102-0176

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Sincerely,
Robert Pankratz
801 N Hanley Road
University City, MO 63130

Carol Comer, Director, Missouri Department of Natural Resources
1101 Riverside Drive
Jefferson City, MO 65102-0176

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Sincerely,
Gail Strong
2785 Holt Woods Rd.
Reed's Spring, MO 65737

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I drive an electric car, use a cordless cultivator in my garden and an electric chainsaw. I do not need to wear hearing aids when I use these quiet tools. I am an eighty two year old Republican voter and want us to all go for renewable energy. I have grou

Sincerely,
Louise Belt
18318 Rieger RD
Wildwood, MO 0

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1101 Riverside Drive
Jefferson City, MO 65102-0176

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Sincerely,
Jane O'Donnell
3945 N 19th St
St. Louis, MO 63107

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Sincerely,
Brenda Hill
27006 Herring Rd
Greenwood, MO 64034

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Jefferson City, MO 65102-0176

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Sincerely,
Ernest Honigmann
9 Colonial Village Court, Apt. B
St. Louis, MO 0

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Sincerely,
Jean Roselle
605 Heidman Rd
Columbia, MO 0

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Jefferson City, MO 65102-0176

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past time to get rid of the pollutions from gas

Sincerely,
Bonita Shea
PO Box 407
Wasola, MO 65773

#35

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Friday, May 04, 2018 10:34:00 AM
Last Modified: Friday, May 04, 2018 11:12:35 AM
Time Spent: 00:38:35
IP Address:

Page 1

Q1 Contact Information

First Name	Steve
Last Name	Ahrens
Email Address	
Affiliation	Missouri Propane Education and Research Council
City	Jefferson City
State	MO

Feedback on Draft Beneficiary Mitigation Plan

Q2 The department welcomes comments about the draft plan. Please use this place to express your thoughts about the draft plan and offer specific improvements.

Dear Director Moore:

I will reiterate my earlier comments that applaud the division's reconciliation of various competing interests in compiling the Beneficiary Mitigation Plan. Although MOPERC advocated for up to 100% of the available monies being designated for school bus replacements, DNR's allocation of \$12 million for buses plus \$3 million DERA and \$4 million transit/shuttle buses is generous while recognizing other state needs. Thank you for recognizing the opportunity and making this designation.

Other stakeholders have brought forward their concerns with funding levels of other categories. To that end, I'm wondering about one of the survey slides presented at the public meeting which pegged public support of Award Category #7 (EV charging) at \$2.8 million, yet the agency allocated \$6 million, the maximum allowed.

EV infrastructure is problematic. It does not reduce NOx by a single molecule and merely provides an occasional, secondary source of charging for an existing EV. No electric vehicles will be purchased due to the availability of a highway charging location. Given the needs of other categories and the speculative nature of EV infrastructure, any funding in this category is questionable use of VW monies, in my mind.

No one can know the future, but we can sense the arc of progress. As electric vehicles rise, so will autonomous driving. Personal vehicles, particularly in metro areas, will be replaced by the equivalent of driverless Uber transportation. Pump-style EV charging at roadside locations will not be useful in this transition. VW money will be building yesterday's charging infrastructure today for tomorrow's needs. That doesn't seem to be a wise investment, doesn't reduce NOx at all, and relies on cooperation between electricity providers that may run afoul of current PSC regulations regarding expenditures by investor-owned utilities. None of this supports the level of funding that the agency has recommended.

I do not make the above comments to increase the amount being designated for buses but know that some have voiced the need for more funding for freight/tug replacements. With a \$2 billion fund designated ONLY for electrification projects, none of which can be tapped by Category #5 applicants, the agency may want to revisit the NOx reductions offered by Categories #5 and #7 and refer the EV projects to a more appropriate funding source.

Sincerely,

Steve Ahrens

President, MOPERC

Q3 If you prefer, you can upload your comments about the draft plan from a separate file. File types allowed are .pdf, .doc and .docx, and image file types .png, .jpg, .jpeg, and .gif. The size limit is 16MB.

Respondent skipped this question

#36

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Friday, May 04, 2018 11:12:05 AM
Last Modified: Friday, May 04, 2018 11:13:17 AM
Time Spent: 00:01:12
IP Address:

Page 1

Q1 Contact Information

First Name	Patrick
Last Name	Justis
Email Address	
Affiliation	Ameren Missouri
City	St. Louis
State	MO

Q2 The department welcomes comments about the draft plan. Please use this place to express your thoughts about the draft plan and offer specific improvements.

Please see uploaded document with comments from Ameren Missouri. Thank you

Q3 If you prefer, you can upload your comments about the draft plan from a separate file. File types allowed are .pdf, .doc and .docx, and image file types .png, .jpg, .jpeg, and .gif. The size limit is 16MB.

Ameren Missouri Comments on MDNR draft plan.pdf (273.4KB)

Draft Ameren Missouri Comments on MDNR's Draft Plan

Ameren Missouri is generally supportive of *Missouri's Draft Volkswagen Trust Plan* (as well as the draft *Implementation Guidelines*). The documents demonstrate that MDNR has put a lot of work into drafting a plan having goals consistent with the Trust intentions and requirements while attempting to balance the various competing interests in Missouri. Ameren Missouri appreciates your efforts and offers the following comments for consideration

- We fully support MDNR's proposed Category 8 related to electric vehicle charging infrastructure, the team approach, and the contingency plan and have participated in the joint provided by the Missouri EV Collaborative separately.
- With regard to Transit and Shuttle Buses, MDNR's estimates of lifetime NOx reduction shown on page 14 seem low (for electric replacements) considering that light duty EV's have almost a 50% reduction in our territory compared to similar internal combustion engine (ICE) vehicles. For this reason, Ameren Missouri recommends that MDNR shift \$2 million from school buses to Transit and Shuttle Buses category and earmark this amount for electric only while keeping the stated match requirements. Further, we suggest a separate scoring for Electric Transit and Shuttle Buses to help this developing area which may have difficulty competing against diesel to diesel replacements. Doing this would achieve two worthy objectives: 1) Advance electric bus technology that will have a large impact on overall and ground level emissions; 2) Target mitigation trust funds to underserved communities that use public transit, especially in non-attainment areas.
- We are supportive of the Category 6 funding for Airport and Cargo Equipment.
- We are supportive of the emphasis placed on the St. Louis metro areas of non-attainment.

Thank you for your consideration of our comments. Please contact us with any questions.

Patrick Justis
Ameren Missouri

#37

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Friday, May 04, 2018 1:42:48 PM
Last Modified: Friday, May 04, 2018 1:45:05 PM
Time Spent: 00:02:17
IP Address:

Page 1

Q1 Contact Information

First Name	Chris
Last Name	Kraft
Email Address	
Affiliation	Spire Inc.
City	St. Louis
State	Missouri

Q2 The department welcomes comments about the draft plan. Please use this place to express your thoughts about the draft plan and offer specific improvements.

My comments for both the Draft Beneficiary Mitigation Plan and the Draft Implementation Guidelines are in a single Word document (attached).

Q3 If you prefer, you can upload your comments about the draft plan from a separate file. File types allowed are .pdf, .doc and .docx, and image file types .png, .jpg, .jpeg, and .gif. The size limit is 16MB.

VW Funding Comments 2018-05-04.docx (216KB)

May 4, 2018

For consideration of the MODNR Staff –

First, I would like to thank the staff of the Missouri Department of Natural Resources for their tremendous efforts on this program. There is no doubt that this funding offers a unique opportunity for the State of Missouri to reduce NOx emissions and meet other worthy objectives. The Department has successfully gathered input from various stakeholders (in state and out) and has led a very constructive, transparent, and inclusive process. Thank you all for your extraordinary efforts.

General Comments:

- I strongly support the competitive scoring formula based on Projected NOx Reductions per VW \$ spent. This ensures that the most meaningful projects are funded first and brings a competitive element to the application process. I believe this form of competition is smart and will ultimately provide Missouri with the most benefit of the primary objective, reducing NOx emissions.
- For any Competitively Scored categories, I do not see the need for varying Maximum Funding limits between different technologies (unless dictated by the consent decree). Ultimately, since these applications are competitively scored – there is already a mechanism to favor the most effective projects. These funding limits may inadvertently steer applicants to technologies that are less efficient in regards to NOx reductions because they have more funding dollars available.
- **Regarding Award Categories 4, 5, 6, and 7** – if the funds are not used in the first round, they are scheduled to immediately roll-up to Categories 1, 2, and 3. The most recent schedule suggests that some categories will be opened in Summer of 2018 and projects will be selected in Fall of 2018. Since this is such a narrow timeframe, there may be prospective respondents with worthy projects that are simply not able to submit that quickly. They may require more time to submit paper work, need to wait for fueling infrastructure, or may require additional time to assess their vehicle turnover cycles. Instead of immediately rolling these funds over to other categories, I recommend allowing a second application process for the funds to be used in the same category. The primary benefit would be to give applicants more time, if necessary, but it may be beneficial to have slight increases in Maximum Funding Available or Cost Share (where applicable).
- **Award Category #5 Locomotive and Marine.** If all the funds are not issued in the initial round, I recommend issuing a second round and removing the maximum of \$1 million per applicant. As noted, this category has potential for dramatic NOx emission reductions and I think it is smart to leave the option available to allocate all \$2 million to a single, large project.
- **Award Category #8: Electric Vehicle Charging Stations.** \$6.15 million is a considerable portion of Missouri's total allocation of VW funds. My primary concern is that the full \$6.15 million is being guaranteed up front, regardless of utilization. All the other categories have to show an actual emissions reduction. Charging infrastructure cannot significantly impact NOx reductions if it is underutilized. I recommend releasing this money in 4 waves of equal values, with a period in between each to gauge effectiveness. For example, the first wave of \$1.5 million will be issued,

followed by a trailing evaluation period (maybe 12 months, as example) with very specific targets to meet (likely kWh sales). If the targets are met, the next wave of funds will be released to this same category (and the process will continue until the funds are exhausted or the targets are missed). Without this type of tiered structure, the incentive may simply be to build the infrastructure – not necessarily to have it used and useful. Without any additional measures, we run the risk of using 15% of Missouri's VW money to fund infrastructure, without any meaningful impact to the primary objective of NOx reduction.

- **Award Category #8.** I agree with the decision to exclude Hydrogen fueling stations from this category, as they are extremely expensive and building infrastructure without any vehicles is very speculative in nature.
- The Kansas City metro area seems to be receiving a small amount of the funds at 10%. I would like to ensure that this allocation is representative of the affected vehicles that were within the KC metro area and that they are receiving a fair proportion.

Electric Vehicle Emissions Scoring:

In order to truly maximize Missouri's health and air quality benefits from these funds, I feel it is critical that we accurately score emissions associated with power generation in Missouri for Electric Vehicles and other applications.

- In the categories which are competitively scored, Electric Vehicles are allocated 25% of the emissions of a new diesel in order to compensate for their emissions related to the generation of power. After some research, I believe that this number may be far too low and it deserves a formal review.
- The following statistics are provided by the EIA regarding power generation in the State of Missouri:
 - Approximately 80% of our utility power is generated by burning coal.
 - 8 of our 10 largest power generation facilities are coal-fired plants.
 - Renewables (wind, solar, hydro), made up less than 2% of our utility power generation in 2016.
 - Renewable utility power generation (wind, solar, hydro) **decreased by 20%** between 2015 and 2016. (1.271 million MWh in 2016 vs. 1.595 million MWh in 2015).
 - Total renewable power generation (which includes utility and non-utility), makes up approximately 3% of Missouri's total power generation.
 - Total renewable power generation **decreased by 8%** between 2015 and 2016. (2.423 million MWh in 2016 vs. 2.645 million MWh in 2015).
 - While coal consumption for power generation has been decreasing nationally – **the EIA has reported an increase in coal consumption for power generation in the State of Missouri in 2017.**
 - Many states are replacing their old coal burning power plants with natural gas, which brings many advantages regarding air quality, including NOx reductions. However, **the State of Missouri actually used less natural gas for power generation in 2016 than it did in 2012.** (4.495 million MWh in 2012 vs. 4.173 million MWh in 2016).
 - **According to the EIA, only two states in the US consumed more coal for power generation in 2017.**

These funds were allocated to Missouri with the primary purpose of reducing NOx emissions and improving the air quality for residents. In our state, we produce a large majority of our electricity from

coal – which emits a considerable amount of NOx. By continued electrification, we may simply be moving NOx emissions from the tailpipe to power plants in Missouri – which is a great disservice to the Missourians that live in these areas. An initial study should be conducted that accurately accounts for the true emissions associated with power generation in Missouri. I recommend that a fair, unbiased analysis be performed to accurately estimate NOx emissions from power generation – using real numbers from Missouri from reputable sources

Using the current power generation profile, I was able to do an analysis for on-road electric vehicles, for illustrative purposes. Numbers for Missouri NOx emissions, Power Generation, etc. all publicly available through EIA's website (2016 are most recent figures made available).

MO Total Power UTL NOx Emissions	54,000	metric tons
Grams per Metric Ton	1,000,000	
MO Total Power UTL NOx Emissions	54,000,000,000	Grams
Power UTL Total Power Production	78,611,513	MWh
KWh per MWh	1,000	
Power UTL Total Power Production	78,611,513,000	KWh
MO UTL Grams of NOx per KWh	0.687	g Nox/kWh
MO Grams of Nox per MWh	686.922	g Nox/MWh
Chevy Volt Miles per kWh	3.4	Reported by OEM
Grams of Nox per Mile	0.202	
Missouri Transportation & Distribution losses	5.20%	
Grams of Nox per kWh (Adj for T&D Loss)	0.721	
Grams of Nox per Mile (Adj for T&D Loss)	0.212	

Based on my calculations – a Chevy Volt currently charging from the average power utility in Missouri would emit 0.212 grams NOx/mile. From what I have been able to find, the current [EPA vehicle standards](#) – it would seem that gasoline/diesel vehicle standards for **maximum allowable** range between 0.2 through 0.6 grams NOx/mile. What this information suggests is that driving an electric passenger vehicle in Missouri may have very similar NOx emissions to new gasoline/diesel models. In some cases, it could even emit more NOx.

Light-Duty Vehicles and Light-Duty Trucks: Clean Fuel Fleet Exhaust Emission Standards^a

	Vehicle Type	Emissions Category	Useful Life Standard	Test Weight (lbs)	NMOG (g/mi)	NOx (g/mi)	CO (g/mi)	Formaldehyde (g/mi)	PM (g/mi) ^b
	LDVs	TLEV	Intermediate	All	0.125	0.4	3.4	0.015	-
		LEV			0.075 ^c	0.2	3.4 ^c	0.015 ^c	-
		ULEV			0.040	0.2 ^c	1.7	0.008	-
		TLEV	Full		0.156	0.6	4.2	0.018	0.08
		LEV			0.090 ^c	0.3	4.2 ^c	0.018	0.08 ^c
		ULEV			0.055	0.3 ^c	2.1	0.011	0.04

According to an NREL study of a Proterra Battery Electric Bus (35' length), the bus averaged 1 mile per 2.15 kWh while operating in California. Assuming there were similar results in Missouri, the buses would average 1.631 grams of NOx/mile (2.15 kWh/mile * 0.687 grams of NOx/kWh * 1.05% loss in T&D). Based on a study I found from the [California Air Resources Board](#), the standard for new diesel transit busses less than 1 gram NOx/mile, on average. From this simple analysis, battery electric buses operating in Missouri may emit more NOx than their current diesel counterparts.

Table 1 Diesel Bus Emission Factors

(Through model year 2017)

Pollutant	Calendar Year	Model Year	Emission Factor (g/mi)	
			Average	45 MPH
ROG	2017	Entire Fleet	1.05	0.52
	2017	1973-83	1.69	0.66
	2017	1984-90	1.69	0.66
	2017	1991-93	1.67	0.40
	2017	1994-95	1.60	0.39
	2017	1996-2001	1.58	0.39
	2017	2002	1.57	0.39
	2017	2003 - 2006	1.42	0.08
	2017	2007 - 2009	0.02	0.004
	2017	2010 - 2017	0.02	0.004
	2017	2017	0.02	N/A***
CO	2017	Entire Fleet	11.75	5.52
	2017	1973-83	16.83	8.08
	2017	1984-90	15.72	7.59
	2017	1991-93	10.13	3.17
	2017	1994-95	12.55	2.12
	2017	1996-2001	13.53	1.67
	2017	2002	15.14	1.67
	2017	2003 - 2006	17.86	2.15
	2017	2007 - 2009	5.44	0.38
	2017	2010 - 2017	5.78	0.38
	2017	2017	6.28	N/A***
NOx	2017	Entire Fleet	17.65	24.83
	2017	1973-83	45.07	30.60
	2017	1984-90	41.42	28.34
	2017	1991-93	25.21	21.47
	2017	1994-95	25.88	25.13
	2017	1996-2001	24.52	25.09
	2017	2002	20.11	17.18
	2017	2003 - 2006	11.36	3.64
	2017	2007 - 2009	1.03	0.73
	2017	2010 - 2017	0.94	0.73
	2017	2017	0.81	N/A***
PM2.5 – Exhaust*	2017	Entire Fleet	0.28	0.37
	2017	1973-83	0.83	0.50
	2017	1984-90	0.81	0.49
	2017	1991-93	0.66	0.22
	2017	1994-95	0.53	0.27
	2017	1996-2001	0.35	0.22
	2017	2002	0.16	0.11
	2017	2003 - 2006	0.05	0.08
	2017	2007 - 2009	0.004	0.006
	2017	2010 - 2017	0.004	0.006
	2017	2017	0.003	N/A***
PM2.5 – Tire Wear	All Years	All Years	0.003	Not Speed-Dependent

Admittedly, the analysis is simplistic and this type of work is not necessarily my specialty. My goal is to show that further analysis needs to be completed to calculate and account for the true emissions for power generation in Missouri. After all, Missouri is the “Show Me State”. If we are going to come up with numbers for emissions related to power generation emissions, it makes sense to have an evidence-based, transparent process. Ahead of any applications being submitted, I recommend that this work be done upfront to get an estimate of these emissions by using real numbers from reliable and neutral sources – with reasonable assumptions for improvements in Missouri’s power generation in the coming decades. **Without proper analysis, we may be inadvertently using these VW funds to increase NOx emissions in Missouri or moving them to other parts of the State (which**

will affect Missourians). This number may turn out to be significantly different than the original allocation proposed by MODNR (25% of emissions of current diesel engines).

Many will point to renewable power sources such as wind and solar and natural gas as cleaner sources of power generation in the near future. While I agree that these technologies will continue to be deployed nationally and within the state, the data I was able to collect has not shown any meaningful penetration of natural gas or renewables being used for power generation in Missouri and there is no significant trends that show reduction in coal consumption in the near future. Any projections for substantial changes to our existing emissions portfolio for power generation should receive a fair level of scrutiny due to the following items:

- Renewables such as Wind and Solar have been around for decades without any significant market penetration in Missouri.
- Missouri power utilities increased their coal consumption for use in power production in 2017
- EIA data suggests Missouri power utilities decreased the amount of renewables and natural gas used for power generation between 2015 and 2016
- These numbers all indicate that power generation in the State of Missouri is simply not moving away from coal in a meaningful way.

It was also suggested during the most recent meeting that since EV's are being allocated emissions for their power generation, that vehicles powered by fossil fuels should be allocated emissions for the production of those fossil fuels. This is commonly referred to as a 'wells-to-wheels', and I do not necessarily disagree with that idea. However, I'll be quick to point out the obvious: since electricity is primarily derived from Coal in Missouri – then EV's should be allocated emissions for the production of that coal. This coal is not produced without environmental impacts and risks (like all forms of energy, including renewables). If that is the case, we may also want to consider environmental issues surrounding coal ash disposal, as well as some other major pollutants from the combustion of coal (such as mercury, CO₂, etc.) and emissions/environmental issues surrounding the mining of lithium ore, which is necessary for lithium ion batteries. This would paint a true comparison on a wells-to-wheels basis but I am not familiar with a simple tool that would incorporate all of these factors. Since MODNR has a tool they are comfortable with to calculate emissions, perhaps it is best to accept the fact that nearly all of our energy for transportation fuel (including electricity) is primarily generated by fossil fuels, all energy production has an environmental risks/costs, and just consider it a wash. This will likely minimize the administration work and costs.

One final point on emissions for electric applications. In some cases, applicants may have their own renewable, on-site power generation (such as solar) or may be purchasing offsetting renewable energy credits for their usage. While the costs for these items cannot be covered under VW funding consent decree, special consideration should be given to the scoring of their emissions. For example, if an applicant is generating their own power from solar or purchasing offsetting credits for usage in their EV – they should score more favorably than a project that uses utility power, which is predominantly powered by coal.

I truly thank the Department for the tremendous amount of time, effort, and care that has gone into this process. It has been a pleasure to participate in this process and I am open to participate further on the behalf of Spire and our many customers across the State of Missouri. I am also happy to field any follow-up questions or provide more information on any of the topics included.

Gratefully,

Chris Kraft

Spire Inc.

700 Market Street

St. Louis, MO 63101

Office

#38

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Friday, May 04, 2018 2:22:53 PM
Last Modified: Friday, May 04, 2018 2:25:00 PM
Time Spent: 00:02:06
IP Address:

Page 1

Q1 Contact Information

First Name	Jane
Last Name	Hinds
Email Address	
Affiliation	Columbia Water & Light
City	Columbia
State	MO

Q2 The department welcomes comments about the draft plan. Please use this place to express your thoughts about the draft plan and offer specific improvements.

The City of Columbia Water & Light Department supports your draft plan as written.

Q3 If you prefer, you can upload your comments about the draft plan from a separate file. File types allowed are .pdf, .doc and .docx, and image file types .png, .jpg, .jpeg, and .gif. The size limit is 16MB.

Respondent skipped this question

#39

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Friday, May 04, 2018 2:47:26 PM
Last Modified: Friday, May 04, 2018 2:53:19 PM
Time Spent: 00:05:52
IP Address:

Page 1

Q1 Contact Information

First Name	Debra
Last Name	Clink
Email Address	
Affiliation	MO Dept. of Elementary and Secondary Education
City	Jefferson City
State	MO

Q2 The department welcomes comments about the draft plan. Please use this place to express your thoughts about the draft plan and offer specific improvements.

Could DNR develop a list of districts that qualify as financial stressed districts or meet 3 of the 5 criteria listed in the implementation plan and have a bus(es) that qualify for VW funds? In developing a list districts could be notified that they automatically qualify to be entered in the lottery. DESE would be happy to assist with data necessary to develop a list of districts that qualify.

Q3 If you prefer, you can upload your comments about the draft plan from a separate file. File types allowed are .pdf, .doc and .docx, and image file types .png, .jpg, .jpeg, and .gif. The size limit is 16MB.	Respondent skipped this question
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#40

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Time Spent: 00:08:05
IP Address:

Page 1

Q1 Contact Information

First Name	Joe
Last Name	Eddy
Email Address	
Affiliation	
City	Missouri Department of Corrections
State	Jefferson City

Q2 The department welcomes comments about the draft plan. Please use this place to express your thoughts about the draft plan and offer specific improvements.	Missouri
	Respondent skipped this question

Q3 If you prefer, you can upload your comments about the draft plan from a separate file. File types allowed are .pdf, .doc and .docx, and image file types .png, .jpg, .jpeg, and .gif. The size limit is 16MB.	
	Respondent skipped this question

#41

COMPLETE

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Started: Friday, May 04, 2018 3:05:10 PM
Last Modified: Friday, May 04, 2018 3:09:13 PM
Time Spent: 00:04:03
IP Address:

Page 1

Q1 Contact Information

First Name	Ewell
Last Name	Lawson
Email Address	
Affiliation	Missouri Public Utility Alliance
City	Columbia
State	MO

Feedback on Draft Beneficiary Mitigation Plan

Q2 The department welcomes comments about the draft plan. Please use this place to express your thoughts about the draft plan and offer specific improvements.

Missouri's Draft Beneficiary Mitigation Plan and Implementation Guidelines for the Volkswagen Trust Comments from the Missouri Public Utility Alliance
May 4, 2018

Missouri cities can lower nitrous oxide emissions through the utilization of the State's \$41 million Volkswagen Trust funds. As an association of municipal utility operators, the Missouri Public Utility Alliance (MPUA or Alliance) can help foster lower emissions in community-owned fleet vehicles and facilitate a network of electric vehicle charging stations. The Alliance has represented 117 electric, water, wastewater, and gas utilities during the stakeholder meetings for mitigation and implementation plan development. There are municipal utilities in areas identified as higher pollution zones and cities with sensitive demographic populations. We support the guidelines suggested by the Missouri Department of Natural Resources (MDNR or Department) to help reduce emissions.

There are numerous types of utility and city government fleet vehicles that produce emissions from continuous, daily use. MPUA assists city utilities and city governments by identifying opportunities for funding to reduce greenhouse gas emissions. We can help identify strong candidates to achieve the goals of the MDNR's Draft Beneficiary Mitigation Plan. The Alliance supports reserving \$6 million of the trust funds for replacing government trucks to newer, lower emission models. When implementing the plan and dispersing funds, we recommend that not only miles driven be a disbursement measurement, but operational hours as a determinant, too. By virtue of how they are used, many local government and utility fleet vehicles have long operational hours but are not high mileage vehicles. High hourly operational use is also a factor in vehicle gas emissions.

Several Missouri city governments own and operate transit systems and airports. MPUA supports reserving \$4 million for transit and shuttle busses. Although there are fewer MPUA members that own airports, there is still a funding need to replace aged, high emission ground support vehicles and equipment. Many municipal entities need funding to help in the transition to more environmentally friendly vehicles.

Further, one MPUA member city, Columbia, that owns the short-line railroad from Centralia to Columbia. Railroads are an important part of Missouri's transportation network. They not only reduce highway traffic, but are also an environmentally friendly shipping method. New multi-engine genset locomotives can reduce particulate matter and nitrous oxide emissions by over 90 percent compared to older locomotives, according to the Union Pacific Railroad. Funding for a new train locomotive would help in the reduction of central Missouri emissions.

Many municipal electric utilities have invested in renewable sources for generating electricity and support the transition to electric vehicles. Even though municipal utilities are not required by state law, MPUA members have invested in wind, solar, and landfill gas produced electricity and lead the state in renewable energy development. Some communities have as much as thirty percent of renewable resources in their power portfolio. This move to renewable energy, coupled with an increasing number of electric vehicles, will go a long way toward the reduction of Missouri's nitrous oxide emissions. MPUA agrees that \$6 million be reserved for electric vehicle fast charging stations in the mitigation plan and would be happy to serve on the board deciding how to disperse the funds.

Sincerely,

Ewell Lawson
Vice President - Government Affairs, Missouri Public Utility Alliance
Chief Operating Officer, Missouri Association of Municipal Utilities

Feedback on Draft Beneficiary Mitigation Plan

Q3 If you prefer, you can upload your comments about the draft plan from a separate file. File types allowed are .pdf, .doc and .docx, and image file types .png, .jpg, .jpeg, and .gif. The size limit is 16MB.

MPUA Comments 5.4.18 - DNR Draft Beneficiary Mitigation Plan and Implementation Guidelines - Volkswagen Trust.pdf (238.2KB)



Serving Municipal Utilities

**Missouri's Draft Beneficiary Mitigation Plan and Implementation Guidelines for the Volkswagen Trust
Comments from the Missouri Public Utility Alliance
May 4, 2018**

Missouri cities can lower nitrous oxide emissions through the utilization of the State's \$41 million Volkswagen Trust funds. As an association of municipal utility operators, the Missouri Public Utility Alliance (MPUA or Alliance) can help foster lower emissions in community-owned fleet vehicles and facilitate a network of electric vehicle charging stations. The Alliance has represented 117 electric, water, wastewater, and gas utilities during the stakeholder meetings for mitigation and implementation plan development. There are municipal utilities in areas identified as higher pollution zones and cities with sensitive demographic populations. We support the guidelines suggested by the Missouri Department of Natural Resources (MDNR or Department) to help reduce emissions.

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Sincerely,
A handwritten signature in blue ink, appearing to read "Ewell Lawson", is written over the word "Sincerely,".

Ewell Lawson
Vice President - Government Affairs, Missouri Public Utility Alliance
Chief Operating Officer, Missouri Association of Municipal Utilities

#42

COMPLETE

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Started: Friday, May 04, 2018 4:23:02 PM
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Time Spent: 00:01:35
IP Address:

Page 1

Q1 Contact Information

First Name	Mollie
Last Name	Freebairn
Email Address	Jefferson City
City	MO
State	

Q2 The department welcomes comments about the draft plan. Please use this place to express your thoughts about the draft plan and offer specific improvements.

Mollie Freebairn
Executive Director, Show Me Solar
303 Norris Drive
Jefferson City, Missouri 65109

May 4, 2018

Ms. Kyra Moore, Director
Missouri DNR Air Pollution Control Program
P.O. Box 176
Jefferson City, MO 65101

RE: Missouri’s Draft Documents for the Volkswagen Trust

Dear Ms. Moore:

Thank you for the opportunity to attend the April 20, 2018 public meeting and presentation held by the Air Pollution Control Program, and provide comments on the:

- Volkswagen Trust – Missouri’s Draft Beneficiary Mitigation Plan, and
- Missouri’s Draft Volkswagen Trust Implementation Guidelines.

As noted in the Executive Summary:

Feedback on Draft Beneficiary Mitigation Plan

As noted in the Executive Summary:

“The State of Missouri is a beneficiary of the Environmental Mitigation Trust Agreement (VW Trust) resulting from a consent decree between Volkswagen AG, et al, California, and the United States. The VW Trust requires proceeds be used only for the types of environmental mitigation projects listed in the consent decree that reduce emissions of nitrogen oxide (NOx) pollution. The Missouri Department of Natural Resources (Department), the state’s lead agency as chosen by the governor, developed this draft 10-year Beneficiary Mitigation Plan for awarding the \$41,152,051.74 million in proceeds to Missouri-specific projects based on extensive stakeholder input.”

The Air Pollution Control Program (APCP) draft proposes to allocate \$12 million to School buses with 2009 and older engines to be replaced with a new bus or engine. Implementation for School bus funds will use a lottery-style selection process to reduce the administrative costs. Other things being equal, this would be an equitable approach. However there remains the possibility that some schools with greater resources and lower overall student exposures and harmful health effects due to diesel exhaust may receive a disproportionate amount of the benefit via the lottery process.

In order to maximize the reductions in diesel emissions and exposures to the most highly exposed students, it may be necessary to more directly determine which buses and or/ engines most need to be replaced. This may further reduce administrative costs for the schools overall. At the same time it will have the benefit of the APCP’s ability to incorporate the most cost-efficient emission reduction measures. If all schools are encouraged to apply, and submit only the information required to conduct an initial screening, it may save on administrative and engineering costs for the APCP as well.

The criteria for Disadvantaged Schools raises some questions, such as why the schools must own the buses. The overarching goal should be to quantitatively reduce the exposures to the greatest number of the highest at-risk students.

Younger children are most vulnerable to the harmful health impacts of air pollution, and so age as well as air quality should be a factor. A strong case can be made to providing all the funding to the most economically disadvantaged students’ school buses.

Similar concerns apply to other categories, such as Shuttle and Transit Buses, and Nongovernment Trucks. Namely, that fleets with greater resources have an advantage in preparing and submitting qualifying applications.

In closing, I have been working on energy and environmental issues in Missouri for over 25 years. Please let me know if I can provide any additional information or assistance.

Thank you again for this opportunity to comment on this outstanding project!

Mollie Freebairn
Energy & Environmental Scientist
303 Norris Drive
Jefferson City, Missouri 65109

Q3 If you prefer, you can upload your comments about the draft plan from a separate file. File types allowed are .pdf, .doc and .docx, and image file types .png, .jpg, .jpeg, and .gif. The size limit is 16MB.

Comments to Missouri DNR APCP on Proposed VW Settlement Plan.doc(25.6KB)

Mollie Freebairn
Executive Director, Show Me Solar
303 Norris Drive
Jefferson City, Missouri 65109

May 4, 2018

Ms. Kyra Moore, Director
Missouri DNR Air Pollution Control Program
P.O. Box 176
Jefferson City, MO 65101

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Mollie Freebairn
Energy & Environmental Scientist
303 Norris Drive
Jefferson City, Missouri 65109

#43

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Last Modified: Friday, May 04, 2018 4:31:46 PM
Time Spent: 00:03:32
IP Address:

Page 1

Q1 Contact Information

First Name	Kelly
Last Name	Gilbert
Email Address	
Affiliation	Metropolitan Energy Center
City	KANSAS CITY
State	MO

Q2 The department welcomes comments about the draft plan. Please use this place to express your thoughts about the draft plan and offer specific improvements.

Metropolitan Energy Center and Kansas City Regional Clean Cities are generally supportive of the goals, award categories and funding amounts outlined in the draft Mitigation Plan. We thank you for your deliberate, open and considerate process and for the detailed approach to achieving the goals of the program.

Q3 If you prefer, you can upload your comments about the draft plan from a separate file. File types allowed are .pdf, .doc and .docx, and image file types .png, .jpg, .jpeg, and .gif. The size limit is 16MB.

Respondent skipped this question

#44

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Friday, May 04, 2018 4:29:14 PM
Last Modified: Friday, May 04, 2018 4:42:01 PM
Time Spent: 00:12:47
IP Address:

Page 1

Q1 Contact Information

First Name	Lisa
Last Name	Stuecken
Email Address	
City	Jefferson City
State	MO

Q2 The department welcomes comments about the draft plan. Please use this place to express your thoughts about the draft plan and offer specific improvements.

A few minor things:

- 1) page 9 says the max funding that "could be moved to the award category for school buses is \$18 million". This implies \$18m can be moved. Suggest replacing "moved to" with "dedicated to" or "available for".
 - 2) page 13 bullet related to areas not meeting air quality standards ... remove the word "include".
-

Q3 If you prefer, you can upload your comments about the draft plan from a separate file. File types allowed are .pdf, .doc and .docx, and image file types .png, .jpg, .jpeg, and .gif. The size limit is 16MB.

Respondent skipped this question

#45

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Friday, May 04, 2018 4:05:53 PM
Last Modified: Friday, May 04, 2018 5:08:50 PM
Time Spent: 01:02:57
IP Address:

Page 1

Q1 Contact Information

First Name	Paul
Last Name	Brugmann
Email Address	
Affiliation	Cummins Inc.
City	COLUMBIA
State	MO

Q2 The department welcomes comments about the draft plan. Please use this place to express your thoughts about the draft plan and offer specific improvements.

My main comments are, the function of the "bold line" (table 3, pg. 9), and the amount allocated to Category 5, Locomotive and Marine. Referring to Table 4 (pg. 11), the "Overall Goal – reduce NOx in a cost-effective manner", I'd like to see more money dedicated to Category 5, Locomotive and Marine, given that the Estimated Emissions Benefit (Table 5, pg. 14), far outweighs that of any of the other categories. Given the higher cost of these projects, \$2M could eliminate some very good projects from not receiving funds.

I understand the explanation that public input had significant influence in the amount of funding assigned to each of these categories (pg. 11). However, I think some consideration needs to be given to the quantitative difference in the scale of the School Bus category vs. Locomotive and Marine. While there are hundreds of school districts with thousands of buses, there are only a relative handful of river tug boat companies, but from my speaking to them I know there is need and interest among them.

My recommendations would be, assign more funding to Category 5, especially since if not utilized it will rise up above the "bold line" regardless. I think the opportunity within that category to reduce NOx emissions merits that they are given the opportunity for funding. An alternative and/or an additional recommendation that could provide Category 5 a better opportunity for funding would be to look at the funds allocated for Categories 4, 5, and 6 as a pool of funds, and if for example, Category 4 does not use all of its funds, the unused funding would be made available for qualified Category 5 projects that the original \$2M could not support, before those funds rise up over the "bold line".

Q3 If you prefer, you can upload your comments about the draft plan from a separate file. File types allowed are .pdf, .doc and .docx, and image file types .png, .jpg, .jpeg, and .gif. The size limit is 16MB.

VW Mitigation Plan Comments01.docx (12.5KB)

My main comments are, the function of the "bold line" (table 3, pg. 9), and the amount allocated to Category 5, Locomotive and Marine.

Referring to Table 4 (pg. 11), the "Overall Goal – reduce NOx in a cost-effective manner", I'd like to see more money dedicated to Category 5, Locomotive and Marine, given that the Estimated Emissions Benefit (Table 5, pg. 14), far outweighs that of any of the other categories. Given the higher cost of these projects, \$2M could eliminate some very good projects from not receiving funds.

I understand the explanation that public input had significant influence in the amount of funding assigned to each of these categories (pg. 11). However, I think some consideration needs to be given to the quantitative difference in the scale of the School Bus category vs. Locomotive and Marine. While there are hundreds of school districts with thousands of buses, there are only a relative handful of river tug boat companies, but from my speaking to them I know there is need and interest among them.

My recommendations would be, assign more funding to Category 5, especially since if not utilized it will rise up above the "bold line" regardless. I think the opportunity within that category to reduce NOx emissions merits that they are given the opportunity for funding.

An alternative and/or an additional recommendation that could provide Category 5 a better opportunity for funding would be to look at the funds allocated for Categories 4, 5, and 6 as a pool of funds, and if for example, Category 4 does not use all of its funds, the unused funding would be made available for qualified Category 5 projects that the original \$2M could not support, before those funds rise up over the "bold line".

#46

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Friday, May 04, 2018 11:28:19 PM
Last Modified: Friday, May 04, 2018 11:36:28 PM
Time Spent: 00:08:08
IP Address:

Page 1

Q1 Contact Information

First Name	Andy
Last Name	Knott
Email Address	
Affiliation	Sierra Club
City	St. Louis
State	Missouri

Q2 The department welcomes comments about the draft plan. Please use this place to express your thoughts about the draft plan and offer specific improvements.

Attached are comments from 350 KC, 350 STL, Ethical Society of Saint Louis, Indy Energy, Labadie Environmental Organization, League of Women Voters of Metro St. Louis, Mid-Missouri Peaceworks, Midwest Coalition for Responsible Investment, Missouri Coalition for the Environment, Missouri Solar Energy Industry Association, Natural Resources Defense Council, New Northside Missionary Baptist Church, Organizing For Action - Missouri, Renew Missouri and Sierra Club.

Q3 If you prefer, you can upload your comments about the draft plan from a separate file. File types allowed are .pdf, .doc and .docx, and image file types .png, .jpg, .jpeg, and .gif. The size limit is 16MB.

MO VW NGO Draft Plan Comments FINAL 5.4.18.pdf(476KB)



**INDY
ENERGY**



May 4, 2018

Missouri Department of Natural Resources
ATTN: Carol Comer, Director
1101 Riverside Drive
Jefferson City, MO 65102

Re: Comments on DNR's Draft VW Settlement Implementation Plan

Dear Ms. Comer,

350 KC, 350 STL, Ethical Society of Saint Louis, Indy Energy, Labadie Environmental Organization, League of Women Voters of Metro St. Louis, Mid-Missouri Peaceworks, Midwest Coalition for Responsible Investment, Missouri Coalition for the Environment, Missouri Solar Energy Industry Association, Natural Resources Defense Council, New Northside Missionary Baptist Church, Organizing For Action - Missouri, Renew Missouri and Sierra Club, appreciate the opportunity to comment on the Missouri Department of Natural Resources ("MDNR" or "Department") draft beneficiary mitigation plan and guidelines for use of the \$40M+ available to Missouri under the Volkswagen Environmental Mitigation Trust ("EMT").

Our overarching aim is to ensure that investments pursued and made by MDNR through the

EMT result in meaningful, long-term and cost-effective reductions in nitrogen oxides (“NOx”) and other polluting emissions from Missouri’s transportation sector, particularly in nonattainment areas and communities that are heavily burdened by such pollution.

We thank the Department for its hard work in developing the draft plan and for leading a careful, transparent stakeholder process. This plan is a step in the right direction to reduce harmful emissions from Missouri's transportation sector, but could be improved to maximize its impact and set the State on a path to transform its transportation sector.

First, we offer our strong support for the following elements of the Draft Plan:

- MDNR’s intention to spend the maximum allowable on EV charging infrastructure (15% or \$6M+) and to focus on the development of fast charging infrastructure to support interstate travel.
- MDNR’s intention to allocate \$2M for all-electric airport ground support equipment and forklift replacements.
- Higher incentive levels for electric technologies in the school bus program and for non-government owned transit buses.

Second, we offer the following recommendations to improve the draft plan and maximize the impact of EMT funds:

- **MDNR should value emissions reductions on a *total lifetime vehicle cost* basis, as opposed to upfront vehicle costs.** We appreciate that Missouri's goals for use of the funds include "improv[ing] the air in areas with large numbers of sensitive individuals and those disproportionately burdened with air pollution," in addition to more general air quality and emissions reduction benefit. However, the goals could be improved by considering the potential for market transformation that exists with certain technologies and weighing cost-effectiveness using total cost of ownership figures for vehicles, which will capture the fuel and maintenance savings of electric technologies that allow transit agencies to lock-in cost savings that can be reinvested in clean vehicles.¹
- **MDNR should carve out specific funds to support electric technologies and to spur market transformation.** Nearly 75 percent of the funds (\$30M/\$41M) in the draft plan will be allocated to general award categories without specifying or prioritizing among available vehicle replacement technologies. The Department also intends to spend the "minimum" amount necessary for administration and implementation of the plan. Taken together, this approach creates a likelihood that the vehicle replacements will not result in emissions reductions greater than what would have occurred anyway through business-as-usual replacement, and that the Department may not have administrative capacity to support new technology options (e.g., electric technologies). We would suggest that, at minimum, the State carve out

¹ See *Comments of Ethical Society of St. Louis, League of Women Voters of Metro St. Louis, Mid-Missouri Peaceworks, Midwest Coalition for Responsible Investment, Missouri Coalition for the Environment, Natural Resources Defense Council, Organizing For Action - Missouri Climate Team, Renew Missouri and Sierra Club* submitted to MNDR on January 23, 2018 (explaining that demonstrated, market-ready electric technologies exist and can out compete other technologies on total cost of ownership and least-cost NOx reductions).

some money from each of the school bus, transit and truck allocation for explicit use of electric technologies.² Alternatively, MDNR should increase incentive levels for electric technologies.

- **MDNR should incorporate environmental justice targets into all award categories, rather than only a few.** Commenters appreciate MDNR’s recognition of the need to address pollution issues for sensitive populations and those disproportionately affected by air pollution, and support its intention to reserve minimum portions of the funds in various award categories for projects in communities with high concentrations of diesel emissions or historic air quality issues. However, these environmental justice factors are not taken into account for the “transit and shuttle bus,” “government truck and non-government truck award categories. This is despite the fact that MDNR recognizes that the types of vehicles operated in “areas of concentrated diesel emissions” include “buses” and “medium- and heavy-duty trucks.”³ To more fully address the most significant sources of transportation pollution, as well as to improve access to clean transportation options for all Missourians, we recommend that MDNR incorporate environmental justice considerations into all award categories.

Commenters thank MDNR for the opportunity to submit these comments. We look forward to continued work with the Department and other stakeholders to support forward-looking, transformative, and cost-effective use of the Volkswagen EMT in the State, and to meaningfully reduce NOx and other polluting emissions from Missouri’s transportation sector.

Respectfully submitted,

John Fish Kurman
350 KC
402 Oak St, #2
Kansas City, MO 64111

Anne Barton-Veenkant
350 STL
4032 Humphrey St
St. Louis, MO 63116

Kate Lovelady
Leader
Ethical Society of St. Louis
9001 Clayton Rd
St. Louis, MO 63117

Brent Schondelmeyer
Indy Energy
3704 S. Grand Ave
Independence, MO 64055

Patricia Schuba
President
Labadie Environmental
Organization (LEO)
P.O. Box 112 Labadie MO, 63055

Nancy Miller and Louise Wilkerson
Co-Presidents
League of Women Voters of Metro St Louis
8706 Manchester Road, Suite 104
Saint Louis, MO 63144

² See, e.g., Illinois EPA, Draft Beneficiary Mitigation Plan (February 2018) (setting aside \$10M for all-electric school bus projects); Ohio EPA, Draft Beneficiary Mitigation Plan (December 2017) (setting aside \$3M for all-electric school bus projects).

³ See MDNR Draft Beneficiary Mitigation Plan at 13.

Mark Haim
Director
Mid-Missouri Peaceworks
804-C E. Broadway
Columbia, MO 65201

Barbara Jennings, CSJ
Coordinator
Midwest Coalition for Responsible Investment
6400 Minnesota Ave.
St. Louis, MO 63111-2807

Heather B. Navarro
Executive Director
Missouri Coalition for the Environment
3115 S. Grand Blvd., Ste. 650
St. Louis, MO 63118

Mary Shields
Executive Director
Missouri Solar Energy Industries Association
55 Shagbark Rd
Sunrise Beach, MO 65079

Aloysius Makalinao
Schneider Fellow
Natural Resources Defense Council
20 N. Wacker Dr. Suite 1600
Chicago, IL 60606

Rodrick K. Burton
Pastor
New Northside Missionary Baptist Church
8645 Goodfellow Blvd.
St. Louis, MO 63147

James A. Page, Jr. PMP
Saint Louis Chapter Lead
Organizing For Action – Missouri
P. O. Box 775692
Saint Louis, MO 63177-5692

James Owen
Executive Director
Renew Missouri
409 Vandiver Dr
Building 5 #205
Columbia, MO 65202

Andy Knott
Senior Campaign Representative
Sierra Club
2818 Sutton Blvd
St. Louis, MO 63143

cc: Kyra Moore, Environmental Quality Deputy Division Director
Darcy Bybee, Air Quality Planning Section Chief
Emily Wilbur, State Implementation Plan Unit Chief

Comments Received via Survey Monkey

Draft Implementation Guidelines

#1

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Wednesday, April 11, 2018 9:04:03 AM
Last Modified: Wednesday, April 11, 2018 9:05:14 AM
Time Spent: 00:01:10
IP Address:

Page 1

Q1 Contact Information

First Name	Craig
Last Name	Kreman
Email Address	Newton County Citizen
Affiliation	Joplin
City	MO
State	

Q2 The department welcomes comments about the draft Volkswagen Trust Implementation Guidelines. Please use this place to express your thoughts about the draft guidelines and offer specific improvements.

It was good to see options on how to select mitigation projects and good to see that the School Buses are a focus in eligible mitigation action.

Q3 If you prefer, you can upload your comments about the draft guidelines from a separate file. File types allowed are .pdf, .doc and .docx, and image file types .png, .jpg, .jpeg, and .gif. The size limit is 16MB.	Respondent skipped this question
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#2

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Monday, April 16, 2018 9:22:26 PM
Last Modified: Monday, April 16, 2018 9:23:14 PM
Time Spent: 00:00:48
IP Address:

Page 1

Q1 Contact Information

First Name	Kelly
Last Name	Turner
Email Address	
Affiliation	City Utilities of Springfield
City	Springfield
State	MO

Q2 The department welcomes comments about the draft Volkswagen Trust Implementation Guidelines. Please use this place to express your thoughts about the draft guidelines and offer specific improvements.

Respondent skipped this question

Q3 If you prefer, you can upload your comments about the draft guidelines from a separate file. File types allowed are .pdf, .doc and .docx, and image file types .png, .jpg, .jpeg, and .gif. The size limit is 16MB.

VW Settlement Letter 20180416.pdf(72KB)



April 16, 2018

Kyra L. Moore, Director
MDNR Air Pollution Control Program
1659 E. Elm Street
Jefferson City, MO 65102

Dear Ms. Moore:

The Volkswagen Environmental Mitigation Trust is an opportunity for Missouri to invest in public transit. In accordance with the trust agreement, Missouri will facilitate the distribution of more than \$41 million in funds to reduce mobile source air pollution emissions. We were pleased to see \$4 million allocated in the draft plan for transit buses, and I urge you to consider increasing these funds even more in this category. Public Transit can be an integral part of the mitigation solution.

City Utilities of Springfield's (CU) Transit Operation provides more than a million rides a year for citizens in our community who have few other transportation options. CU Transit also provides jobs for more than 60 employees in Springfield. In addition, transit service has a direct impact on our environment. According to national transit experts, public transportation produces 95% less carbon monoxide, 90% less volatile organic compounds (VOCs) and about half as much carbon dioxide and nitrogen oxide per mile compared to private vehicles. With more people using public transit, we decrease our reliance on fossil fuels. If one in 10 Americans used transit regularly, U.S. reliance on foreign oil could decline by more than 40%, or nearly the amount of oil imported from Saudi Arabia each year. In addition, according to the American Public Transit Association the state receives a \$4 return for every one dollar invested in transit.

Missouri currently provides little state assistance for transit providers even though transit provides significant benefits for this state. Last year, the Missouri Legislature allocated only \$1.7 million for transit providers across the state. The Volkswagen Environmental Mitigation Trust is an opportunity for Missouri to make a significant difference in our environment and the state's economy by investing in transit especially if funds are allocated for electric bus vehicles. Please keep transit as a part of your solution when developing the plan for investment. Thank you for your consideration and please feel free to reach out with any questions.

Sincerely,

Kelly Turner
Director - Transit

417.863.9000
PHONE

301 EAST CENTRAL STREET
Springfield, MO 65802

P.O. BOX 551
Springfield, MO 65801

cityutilities.net
WEB

#3

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Friday, April 20, 2018 1:56:29 PM
Last Modified: Friday, April 20, 2018 1:59:31 PM
Time Spent: 00:03:01
IP Address:

Page 1

Q1 Contact Information

First Name	Allison
Last Name	Wurtz
Email Address	
Affiliation	KEW Grant Services LLC
City	Knoxville
State	TN

Q2 The department welcomes comments about the draft Volkswagen Trust Implementation Guidelines. Please use this place to express your thoughts about the draft guidelines and offer specific improvements.

Please consider including all electric rail car movers under the freight switcher or locomotive category. They perform the exact same function as a freight switcher and no all electric locomotive exists. Nordco Mobile Material Handling is based in Kansas, City MO and they are the only manufacturer in North America to produce an all electric railcar mover. Support your local manufacturers as well as advanced technology by including all electric rail car movers under the freight switcher category.

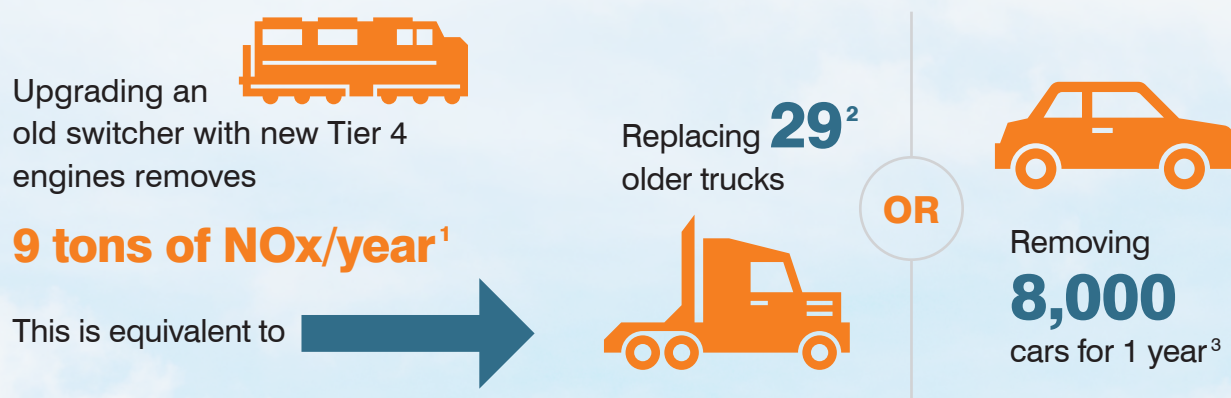
Q3 If you prefer, you can upload your comments about the draft guidelines from a separate file. File types allowed are .pdf, .doc and .docx, and image file types .png, .jpg, .jpeg, and .gif. The size limit is 16MB.	Respondent skipped this question
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The most cost-effective upgrades make the biggest health impact

New Tier 4 engines for switchers reduce NOx emissions by 95%

The \$2.9 billion VW Environmental Mitigation Trust provides funding to upgrade older vehicles and equipment to rapidly reduce nitrogen oxide (NOx) emissions, which contribute to hazardous smog pollution. Upgrading just one of the oldest, dirtiest switchers is like taking tens of thousands

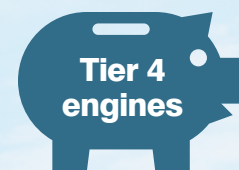
of passenger vehicles off the road per year, bringing substantial health benefits to at-risk communities. With states now deciding how to invest these funds, repowering these older switchers with cleaner Tier 4 engines is a game-changer for delivering immediate and cost-effective air quality benefits.



Upgrading old engines means cleaner air for all

EPA estimates that by 2020, only 5% of switcher engines will be replaced with cleaner Tier 4 engines. The VW Environmental Mitigation Trust provides a rare opportunity to retire the oldest diesel engines still in operation, which can last 70 years or longer. Tier 4 engines will deliver cleaner, healthier air faster to at-risk communities. These new engines also improve fuel efficiency, which reduces CO₂ and black carbon emissions, two important greenhouse gas pollutants.

Switcher projects are a better value



1 ton of NOx reduction costs



#4

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Thursday, April 26, 2018 9:28:20 AM
Last Modified: Thursday, April 26, 2018 9:52:01 AM
Time Spent: 00:23:41
IP Address:

Page 1

Q1 Contact Information

First Name	Jerold
Last Name	Osbourn
Email Address	
Affiliation	Kirbyville R-VI School Superintendent
City	Kirbyville
State	MO

Q2 The department welcomes comments about the draft Volkswagen Trust Implementation Guidelines. Please use this place to express your thoughts about the draft guidelines and offer specific improvements.

For the financially disadvantaged school definition, in addition to the greater than 75 percent free and reduced lunch percentage the Department should also add or consider the implications of school districts that are utilising the Community Eligibility Program (CEP). Currently our elementary school is a CEP building so ALL students eat for free. I believe being a CEP or a Provision 2 school/district shows or indicates financial disadvantage or need.

Lastly, why is less than \$11,000 amount for the 3 year average of total expenditures divided by ADA used as the cutoff?

Q3 If you prefer, you can upload your comments about the draft guidelines from a separate file. File types allowed are .pdf, .doc and .docx, and image file types .png, .jpg, .jpeg, and .gif. The size limit is 16MB.	Respondent skipped this question
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#5

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Friday, April 27, 2018 10:33:48 AM
Last Modified: Friday, April 27, 2018 10:37:04 AM
Time Spent: 00:03:15
IP Address:

Page 1

Q1 Contact Information

First Name	Britta
Last Name	Gross
Email Address	
Affiliation	General Motors
City	Detroit
State	Michigan

Q2 The department welcomes comments about the draft Volkswagen Trust Implementation Guidelines. Please use this place to express your thoughts about the draft guidelines and offer specific improvements.

See attached comments.

Q3 If you prefer, you can upload your comments about the draft guidelines from a separate file. File types allowed are .pdf, .doc and .docx, and image file types .png, .jpg, .jpeg, and .gif. The size limit is 16MB.

Missouri - Draft VW Beneficiary Mitigation Plan Guidelines - General Motors comments_26 April 2018.pdf(138.4KB)

GENERAL MOTORS

Britta K. Gross Director
Advanced Vehicle Commercialization Policy
Environment, Energy & Safety Policy

General Motors Global Headquarters
MC: 482-C30-C76
300 Renaissance Center
Detroit, MI 48265-3000

26 April, 2018

Missouri Department of Natural Resources

Subject: GM Comments relative to Missouri's Draft VW Beneficiary Mitigation Plan – Implementation Guidelines

General Motors LLC (GM) appreciates the effort the Missouri Department of Natural Resources (DNR) put into the development of the draft Beneficiary Mitigation Plan and the Implementation Guidelines and we fully support and appreciate Missouri's decision to firmly allocate the maximum allowed 15% of the fund (equating to roughly \$6mil) to increase the availability of critically-needed electric vehicle (EV) charging stations that will drive both current electrification and advanced mobility strategies for the state.

We are very supportive of the DNR's proposed "Hybrid" approach that will gather expert stakeholders (including automakers and utilities) to establish a comprehensive state-wide plan and scoring scheme for EV charging infrastructure projects. This upfront development of a vision and strategy for the state will maximize the effectiveness of limited funds and ensure that the resulting infrastructure leads to a compelling network for consumers.

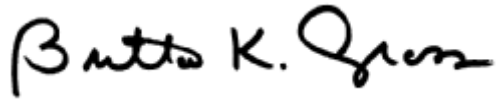
We also agree that it is important to consider and incorporate Electrify America's investments in the planning for charging infrastructure in Missouri. Electrify America is currently firming up charging site locations (the network must be fully operational in 2019), and we believe this site information should be available to Missouri quite a bit earlier than the October 2019 date described in the Implementation Guidelines as the earliest planned draw-down date for Missouri's state funds. We therefore suggest the DNR consider a more accelerated timeline to plan for, and achieve, the highway network goal, than the 2022 date proposed. A more aggressive timeline will better support current EV drivers in Missouri and, importantly, those consumers willing to consider purchasing an EV in the timeframe leading up to 2019-2022.

GM supports the prioritization of highway corridor DC fast-charging in the earliest investments, and workplace and multi-unit residence charging in urban areas as the next priorities in the contingency phase. We suggest it might also make sense to consider level 1 charging at workplaces and multi-unit dwellings, as EVs will likely be parked for many hours at these locations, and level 1 can provide a much more cost-effective solution for limited state funds.

The VW Environmental Mitigation Trust is an opportunity to invest in forward-looking infrastructure that lays a much-needed foundation for EV market growth and will help attract even more advanced transportation technologies to Missouri. GM greatly appreciates the effort the Missouri DNR put into the development of the

initial draft plan and accompanying implementation guidelines, and we look forward to assisting in efforts to help drive this emerging market.

Sincerely,

A handwritten signature in black ink that reads "Britta K. Gross". The signature is written in a cursive, flowing style.

Britta K. Gross, Director
Advanced Vehicle Commercialization
Policy

#6

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Monday, April 30, 2018 8:26:35 PM
Last Modified: Monday, April 30, 2018 8:30:13 PM
Time Spent: 00:03:37
IP Address:

Page 1

Q1 Contact Information

First Name	Bruce
Last Name	Stockton
Email Address	
Affiliation	Private Consultant
City	Joplin
State	Missouri

Q2 The department welcomes comments about the draft Volkswagen Trust Implementation Guidelines. Please use this place to express your thoughts about the draft guidelines and offer specific improvements.

I support the work the MO DNR has done on the implementation plan. While I would like to see a list of the financially disadvantaged schools, I do agree with the percentage of allocation being focused on School Buses. The use of private money for public good makes perfect sense.

Q3 If you prefer, you can upload your comments about the draft guidelines from a separate file. File types allowed are .pdf, .doc and .docx, and image file types .png, .jpg, .jpeg, and .gif. The size limit is 16MB.	Respondent skipped this question
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#7

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Tuesday, May 01, 2018 8:57:26 AM
Last Modified: Tuesday, May 01, 2018 9:01:49 AM
Time Spent: 00:04:23
IP Address:

Page 1

Q1 Contact Information

First Name	Michael
Last Name	Bevis
Email Address	
Affiliation	Joplin School District
City	Joplin
State	Missouri

Q2 The department welcomes comments about the draft Volkswagen Trust Implementation Guidelines. Please use this place to express your thoughts about the draft guidelines and offer specific improvements.

• This implementation guideline will make a difference in the number of buses that are still in operation within our district yet emit high levels of NOx and there is nothing more important than the safety and health of our school children. Also,• Probably not unlike some school districts, Joplin has a very aged bus fleet and this implementation plan will offer some much needed assistance in allowing us to upgrade our fleet at a faster pace.

Q3 If you prefer, you can upload your comments about the draft guidelines from a separate file. File types allowed are .pdf, .doc and .docx, and image file types .png, .jpg, .jpeg, and .gif. The size limit is 16MB.	Respondent skipped this question
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#8

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Tuesday, May 01, 2018 1:07:13 PM
Last Modified: Tuesday, May 01, 2018 2:12:21 PM
Time Spent: 01:05:08
IP Address:

Page 1

Q1 Contact Information

First Name	Connie
Last Name	Ford
Email Address	
Affiliation	Missouri Public Utility Alliance
City	Columbia
State	Missouri

Feedback on Draft Implementation Guidelines

Q2 The department welcomes comments about the draft Volkswagen Trust Implementation Guidelines. Please use this place to express your thoughts about the draft guidelines and offer specific improvements.

See attached pdf file for signed document that includes comments that are listed here:

Missouri's Draft Beneficiary Mitigation Plan and Implementation Guidelines for the Volkswagen Trust Missouri Public Utility Alliance Comments

May 1, 2018

The Missouri Public Utility Alliance, on behalf of our municipal utility members, support the funding guidelines as proposed in the draft Missouri Beneficiary Mitigation Plan for the Volkswagen Trust and for the Implementation Guidelines. As a member of the Stakeholder Advisory Group and the Missouri Electric Vehicle Collaborative, I was happy to see \$6 million of funding for electric vehicle charging stations across the state.

To lower Nitrogen Oxides emissions by Missouri residents and those traveling through our state, there is a need for better access to fast electric vehicle charging stations. The Missouri Electric Vehicle Collaborative is a collection of municipal and investor-owned utilities along with environmental non-profit groups. The group determined a state-wide network of charging stations to help alleviate the long-distance charging barrier in Missouri. This map could be a starting point for the Missouri Department of Natural Resources' electric vehicle team to determine how the allotted money is used.

In the draft of Missouri's Implementation Guidelines, it suggests forming a team to develop a strategic plan for how the money allocated for electric vehicle infrastructure. Both the Missouri Public Utility Alliance and our members have planned for the deployment of electric vehicles and support the installation of charging stations. We would volunteer our time to help the state formulate a plan since we have valuable, technical knowledge and experience of integrating charging stations into the electric grid.

Of great value in reducing emissions through electrifying vehicles is the commitment municipal utilities have for renewable energy. Many of our 117 municipal electric utility members have invested in renewable sources for generating electricity and support the transition to electric vehicles. Even though municipal utilities are not required by state law, our members use wind, solar and landfill gas produced electricity. Some communities have as much as thirty percent of renewable resources in their power portfolio. This move to renewable energy coupled with an increasing number of electric vehicles goes a long way to reducing Missouri's Nitrogen Oxides emissions.

Sincerely,

Connie Ford

Director of Member Services

Missouri Public Utility Alliance

Q3 If you prefer, you can upload your comments about the draft guidelines from a separate file. File types allowed are .pdf, .doc and .docx, and image file types .png, .jpg, .jpeg, and .gif. The size limit is 16MB.

Ford_MPUA_Comments_VWtrustPlanAndImplementation_1May2018.pdf (167.7KB)



Serving Municipal Utilities

**Missouri's Draft Beneficiary Mitigation Plan and Implementation Guidelines for the Volkswagen Trust
Missouri Public Utility Alliance Comments**

May 1, 2018

The Missouri Public Utility Alliance, on behalf of our municipal utility members, support the funding guidelines as proposed in the draft Missouri Beneficiary Mitigation Plan for the Volkswagen Trust and for the Implementation Guidelines. As a member of the Stakeholder Advisory Group and the Missouri Electric Vehicle Collaborative, I was happy to see \$6 million of funding for electric vehicle charging stations across the state.

To lower Nitrogen Oxides emissions by Missouri residents and those traveling through our state, there is a need for better access to fast electric vehicle charging stations. The Missouri Electric Vehicle Collaborative is a collection of municipal and investor-owned utilities along with environmental non-profit groups. The group determined a state-wide network of charging stations to help alleviate the long-distance charging barrier in Missouri. This map could be a starting point for the Missouri Department of Natural Resources' electric vehicle team to determine how the allotted money is used.

In the draft of Missouri's Implementation Guidelines, it suggests forming a team to develop a strategic plan for how the money allocated for electric vehicle infrastructure. Both the Missouri Public Utility Alliance and our members have planned for the deployment of electric vehicles and support the installation of charging stations. We would volunteer our time to help the state formulate a plan since we have valuable, technical knowledge and experience of integrating charging stations into the electric grid.

Of great value in reducing emissions through electrifying vehicles is the commitment municipal utilities have for renewable energy. Many of our 117 municipal electric utility members have invested in renewable sources for generating electricity and support the transition to electric vehicles. Even though municipal utilities are not required by state law, our members use wind, solar and landfill gas produced electricity. Some communities have as much as thirty percent of renewable resources in their power portfolio. This move to renewable energy coupled with an increasing number of electric vehicles goes a long way to reducing Missouri's Nitrogen Oxides emissions.

Sincerely,

A handwritten signature in blue ink that reads "Connie Ford".

Connie Ford
Director of Member Services
Missouri Public Utility Alliance

#9

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Wednesday, May 02, 2018 12:02:37 PM
Last Modified: Wednesday, May 02, 2018 12:10:09 PM
Time Spent: 00:07:32
IP Address:

Page 1

Q1 Contact Information

First Name	Jeff
Last Name	Swenson
Email Address	
Affiliation	Tri-State Motor Transit Joplin
City	MO
State	

Q2 The department welcomes comments about the draft Volkswagen Trust Implementation Guidelines. Please use this place to express your thoughts about the draft guidelines and offer specific improvements.

I am the real estate facilities advisor to a major transport carrier located in Joplin, MO. We currently have about 450 trucks and we are growing. We strongly feel it is important to consider commercial trucking in your plan for EV electrification. As a company, we are currently working on initiatives to reduce idling through the use of shore power installations and planning for the future use of Class 8 EV utilization. Bridged support through grants like this make early initiatives much more viable.

Q3 If you prefer, you can upload your comments about the draft guidelines from a separate file. File types allowed are .pdf, .doc and .docx, and image file types .png, .jpg, .jpeg, and .gif. The size limit is 16MB.	Respondent skipped this question
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#10

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Collector: Web Link 1 (Web Link)
Started: Wednesday, May 02, 2018 4:20:06 PM
Last Modified: Wednesday, May 02, 2018 4:30:03 PM
Time Spent: 00:09:56
IP Address:

Page 1

Q1 Contact Information

First Name	Ryan
Last Name	Calder
Email Address	
City	Liberty
State	MO

Q2 The department welcomes comments about the draft Volkswagen Trust Implementation Guidelines. Please use this place to express your thoughts about the draft guidelines and offer specific improvements.

The first round of applications for school bus replacement projects should be limited to projects which are deploying all-electric vehicles.

Q3 If you prefer, you can upload your comments about the draft guidelines from a separate file. File types allowed are .pdf, .doc and .docx, and image file types .png, .jpg, .jpeg, and .gif. The size limit is 16MB.	Respondent skipped this question
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#11

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Thursday, May 03, 2018 10:06:30 PM
Last Modified: Thursday, May 03, 2018 10:10:49 PM
Time Spent: 00:04:19
IP Address:

Page 1

Q1 Contact Information

First Name	Sherrie
Last Name	Merrow
Email Address	
Affiliation	Natural Gas Vehicles for America (NGVAmerica)
City	Washington
State	DC

Q2 The department welcomes comments about the draft Volkswagen Trust Implementation Guidelines. Please use this place to express your thoughts about the draft guidelines and offer specific improvements.

Please see the attached letter with comments from NGVAmerica. Also, please see the NGVAmerica VW Flyer included with our Plan Comment submission.

Thank you.

Sherrie Merrow
NGVAmerica
Director, State Government Advocacy

Q3 If you prefer, you can upload your comments about the draft guidelines from a separate file. File types allowed are .pdf, .doc and .docx, and image file types .png, .jpg, .jpeg, and .gif. The size limit is 16MB.

NGVAmerica MO VW Beneficiary Mitigation Plan Comments - May 3 2018.pdf (314.9KB)

400 North Capitol Street, N.W.
Washington, D.C. 20001
ngvamerica.org



May 3, 2018

Director Darcy Bybee
Air Pollution Control Program
P.O. Box 176
1101 Riverside Drive
Jefferson City, MO 65102-0176

RE: NGVAmerica Comments on the State of Missouri Draft Volkswagen Trust Beneficiary Mitigation Plan and Implementation Guidelines

Dear Director Bybee:

Natural Gas Vehicles for America (NGVAmerica), the national trade association for the natural gas vehicle industry, respectfully submits the following comments on the State of Missouri (MO) Department of Natural Resources (Department) Beneficiary Mitigation Plan (Plan). These comments are in addition to the NGVAmerica comments submitted to you on April 28, 2017 regarding NGVAmerica's recommendations on how states can best use the Environmental Mitigation Trust (EMT or Trust) funds that each state will receive as part of the Volkswagen (VW) diesel emission settlement. NGVAmerica asks that you also review our April 28, 2017 comments.

The VW EMT funds provide an extraordinary opportunity for Missouri and other states to put significantly cleaner, lower-polluting vehicles on the road in public and private fleets. This funding (\$41.1 million) can and should be used by Missouri to continue its commitment to accelerating the use of cleaner, alternative fuels that offer a cost-effective alternative to funding diesel vehicles.

As shown in our VW Comment Letter submitted on April 28, 2017, NGVAmerica believes that natural gas vehicles (both LNG and CNG) offer the best solutions for the projects that will address the goals of the EMT, to reduce the most nitrogen oxide (NOx) for the least cost. Please see the diesel, electric vehicle and natural gas vehicle comparisons on the attached NGVA VW Flyer for heavy duty trucks, transit buses, refuse trucks and school buses.

In addition to the above on-road applications, natural gas also is capable of powering non-road applications such as freight switchers and other locomotives, which are a component of the VW Beneficiary Mitigation Plan (Plan). This natural gas technology effectively provides what would be a Tier 5 emissions freight switcher (labeled Tier 4 until the U.S. EPA puts out the Tier 5 specifications) at Tier 4 diesel freight switcher pricing. Natural gas ferries and ships are also available. We would urge the Department to ensure that any future funding opportunities or solicitations concerning non-road marine or rail projects be open to natural gas.

The Missouri Department states that its overall VW Mitigation Plan's goal is *"to reduce mobile source emissions of NOx with maximum cost-effectiveness,"* which does exemplify the goals of the Trust. NGVAmerica recognizes the value in providing our school children with cleaner air and supports some of the funding to be designated for this application, but it is difficult to understand why the Department has chosen to dedicate \$12-18 million to fund school buses. School buses typically use low amounts of fuel when compared to heavy duty trucks, so emphasizing their replacement delays significant emissions reductions and the achievement of the Department's overall goal.

With school buses as the first funding priority the Department has then set government trucks followed by transit and shuttle buses as their second and third priorities. While these applications use more fuel than school buses, their fuel usage does not compare to that of the Department's lesser priority Award Categories of non-government trucks and locomotives and marine applications. Based on the project applications received the Department should choose projects that reduce the most NOx for the cost, and not move funding from the categories that will fulfill this goal (leaving school buses at \$12 million or less if enough school bus projects are not proposed).

The private sector can efficiently and quickly implement projects that would cost-effectively maximize air quality benefits, leverage supplemental matching funding and provide additional benefits such as alternative fuel infrastructure usage increases (both existing and new facilities). Also, the private sector fleets are usually in areas of emissions concern and so will better meet the goals of the State's VW Plan.

If renewable natural gas (RNG) is used, life cycle greenhouse gas emissions from NGVs are reduced further. Using RNG also creates a market for energy created from waste water treatment, landfills, animal waste and other methane sources and significantly increases air quality by reducing the amount of methane released.

Specific to the Department's Implementation Guidelines, NGVAmerica offers the following observations and suggestions:

- In several award categories the Guidelines state that single or small numbers of vehicles per applicant will be approved. This creates a problem in leveraging funds for alternative fuels that need fueling stations and supports replacements with diesel vehicles. As an example, natural gas vehicle station operators are often willing to build stations to meet demand at their own cost, but they need enough vehicles to warrant the investment. Priority should be given to projects that will best leverage the VW funding.
- The proposed award amounts seem to favor diesel applications since the amounts are virtually the same for natural gas, propane and diesel. NGVAmerica believes that the State would be more effective in accomplishing NOx reduction goals if diesel was treated as the baseline fuel that the MO Plan says should be reduced and therefore receive minimal VW funding (if any, such as in Colorado).
- Emphasis should be placed on ready projects using proven technologies and implementors.

The VW EMT funds provide an extraordinary opportunity for Missouri to cost-effectively accelerate the transition to cleaner vehicles and lower emissions. Commercially available natural gas vehicles offer the best solutions today for addressing the goals of the EMT, delivering the most nitrogen oxide emission reductions for the least cost.

Current State Beneficiary Mitigation Plans

Twenty-eight states have released draft VW Beneficiary Mitigation Plans and NGVAmerica has reviewed these plans and offered comments. NGVAmerica believes the Colorado Plan provides an excellent model for other states that wish to segment their funding, maximize the use of alternative fuels, and provide parity among alternative fuels (https://www.colorado.gov/pacific/sites/default/files/AP_VW_Beneficiary_Mitigation_Plan.pdf).

In allocating its funds, Colorado did not pick a preferred alternative fuel (diesel is excluded except for fleets of 9 or less trucks) and provides a relative parity for funding for the various fuels through its choice of percentage funding by fuel type. The \$18M set aside by Colorado for Alt Fuel Trucks/School and Shuttle Buses funds all alternative fuels at 40% of the vehicle cost for government and public entities, while private vehicles are funded at 25% of the vehicle cost (not the 75% allowed for EVs because that would result in fewer vehicles and less NOx reductions, and there are other sources for EV funding).

Additional Options for Vehicle Scrappage

NGVAmerica also recommends that Department consider the following vehicle scrappage options in the Plan:

- Increase the options for scrappage beyond a strict replacement of a current fleet vehicle (e.g., allow a fleet to acquire an older vehicle from another fleet or allow a fleet to exchange one of its newer vehicles for another fleet's older vehicle that is then scrapped)
- Since the Trust does not specify the fuel of the scrappage vehicle, allow natural gas vehicles that meet the year criteria to be scrapped and replaced with new NGVs

Use the Most Current Emissions and Cost Benefit Calculation Tools – HDVEC created for VW Projects

The Argonne National Laboratory's AFLEET tool should be used to calculate vehicle / fuel type emissions since this tool has recently been updated to include current data on all vehicles and fuels including in-use emissions data. The AFLEET Tool 2017 updates include:

- Added low-NOx natural gas engine option for CNG and LNG heavy-duty vehicles
- Added diesel in-use emissions multiplier sensitivity case
- Added Idle Reduction Calculator to estimate the idling petroleum use, emissions, and costs for light-duty and heavy-duty vehicles
- Added well-to-pump air pollutants and vehicle cycle petroleum use, GHGs, and air pollutants
- Added more renewable fuel options
- AFLEET Tool spreadsheet and user manual at: http://greet.es.anl.gov/afleet_tool and tool link is: <http://www.afdc.energy.gov/tools>

ANL has also just released a new vehicle emissions calculator (HDVEC) to provide state officials and fleet managers with an accurate tool to gauge emissions reductions across various medium- and heavy-duty vehicle project options affiliated with the Volkswagen Environmental Mitigation Trust Settlement. The HDVEC tool is available at: <http://afleet-web.es.anl.gov/hdv-emissions-calculator/>.

The Department has stated that they will use the current U.S. EPA Diesel Emissions Quantifier (DEQ) to calculate emissions reductions. The DEQ tool is not current in its underlying assumptions and data for today's engines and in-use emissions, therefore NGVAmerica recommends that the Department use the HDVEC tool for all applicable categories, since the data is current, easy to use and was created for VW projects.

Summary of NGVAmerica's Recommendations for EMT Funding

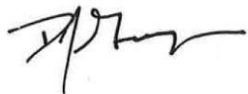
- ✓ Given that the EMT was created because of NOx pollution associated with non-compliant diesel vehicles, we believe that the funding should be set aside for clean, **alternative fuel vehicle projects that focus on maximizing NOx reduction for the funds spent**
- ✓ Provide a larger incentive and greater overall funding for medium- and heavy-duty engines that deliver **greater NOx reductions than currently required** for new vehicles and engines
- ✓ Target funding for technologies that have demonstrated the ability to deliver actual **lower in-use emissions** when operated in real-world conditions

- ✓ Provide the **highest level of funding to applications that produce the largest share of NOx emissions** (in most regions this means prioritizing for short-haul, regional-haul and refuse trucks)
- ✓ Prioritize funding for **commercially available products that are ready for use**
- ✓ Prioritize funding for **clean vehicles rather than fueling infrastructure**
- ✓ **Scale funding to incentivize the cleanest engines available** – at a minimum, provide parity among alternative fuels by following a version of the Colorado VW Plan that funds non-diesel alternative vehicles in the private sector at 25% of the cost of the vehicle and public sector vehicles at 40%
- ✓ Ensure that funding incentivizes adoption by **both public and private fleets**
- ✓ Prioritize projects that include **partnerships that provide a match** such as a CNG or LNG station being built in locations that will receive the VW funding
- ✓ **Accelerate the funding** in the early years to maximize the NOx reduction benefits
- ✓ Use vehicles emissions measurement tools that reflect current technologies and performance under real world operation duty cycles – **Argonne National Laboratory's AFLEET tool and HDVEC tools** are the most current tools available

Compared to other alternative fuels and to diesel vehicles, natural gas vehicles that are commercially available today, offer the best solution for addressing the goals of the EMT. The Department recognizes the value of cost effective NOx reductions that NGVs provide, and that these emission reductions can be realized today.

NGVAmerica welcomes the opportunity to provide further information and analysis on the economic and environmental benefits of natural gas vehicles in Missouri. Please contact Jeff Clarke, NGVAmerica General Counsel & Regulatory Affairs Director at , or Sherrie Merrow, NGVAmerica State Government Advocacy Director at to set up a meeting and for additional information.

Sincerely,



Daniel J. Gage
President

#12

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Friday, May 04, 2018 8:20:16 AM
Last Modified: Friday, May 04, 2018 8:20:54 AM
Time Spent: 00:00:38
IP Address:

Page 1

Q1 Contact Information

First Name	Cara
Last Name	Shaefer
Email Address	
Affiliation	City Utilities of Springfield, MO
City	Springfield
State	Missouri

Q2 The department welcomes comments about the draft Volkswagen Trust Implementation Guidelines. Please use this place to express your thoughts about the draft guidelines and offer specific improvements.

Respondent skipped this question

Q3 If you prefer, you can upload your comments about the draft guidelines from a separate file. File types allowed are .pdf, .doc and .docx, and image file types .png, .jpg, .jpeg, and .gif. The size limit is 16MB.

City Utilities Comments - 5-4-2018.pdf (89.2KB)



May 4, 2018

Missouri's Draft Beneficiary Mitigation Plan and Implementation Guidelines for the Volkswagen Trust City Utilities of Springfield Comments

City Utilities of Springfield, Missouri (City Utilities) is a progressive community-owned utility serving 320 square miles in southwest Missouri with electricity, natural gas, water, broadband, and public transportation services.

We have been part of the Missouri Electric Vehicle Collaborative and are pleased that the Missouri Department of Natural Resources (MDNR) has allocated \$6.1 million dollars towards the effort of expanding Electric Vehicle Charging across the state to lower Nitrous Oxide (NOx) emissions. We are well positioned geographically to help alleviate the long-distance charging barrier in Missouri. City Utilities is supportive of the team approach to develop a strategic plan for allocating the funding and are interested in providing our time, knowledge and experience towards achieving this goal.

Additionally, City Utilities owns and operates the city's public transit system, providing over a million trips each year to our community. We are pleased to see the allocation of \$4 million dollars for the repowering or replacement of transit buses. The implementation plan outlines that half of this funding will be used in specific target areas of the state. Given the tremendous cost for these upgrades, we encourage MDNR to consider providing additional funding through the implementation process should other award categories have insufficient projects submitted.

When it comes to the environment, City Utilities takes pride in our *Mission to Responsibly serve our customers and community beyond their expectations*. One of our six strategic goals is to *Serve our customers in ways that are ethically, fiscally and environmentally responsible*. To meet that goal, City Utilities continues to provide reliable electric generation with the quality of Springfield's natural environment at the top of our minds. We have made extraordinary reductions in emissions from in our electric generation fleet, and in 2017 we achieved an 89% reduction in total emissions from 1988 levels. CU has actively worked to increase Springfield's renewable energy mix, reaching 29% of System Sales in 2017. That number is estimated to increase to 32% in 2018 and 40% in 2019.

This commitment to reducing emissions coincides with the goal of the Environmental Mitigation Trust Agreement and MDNR's work to reduce NOx emissions through the VW Trust.

Sincerely,

Cara Shaefer
Director – Energy Services & Renewables

#13

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Friday, May 04, 2018 10:31:15 AM
Last Modified: Friday, May 04, 2018 10:32:02 AM
Time Spent: 00:00:47
IP Address:

Page 1

Q1 Contact Information

First Name	Steve
Last Name	Ahrens
Email Address	
Affiliation	Missouri Propane Education and Research Council
City	Jefferson City
State	MO

Q2 The department welcomes comments about the draft Volkswagen Trust Implementation Guidelines. Please use this place to express your thoughts about the draft guidelines and offer specific improvements.

Dear Director Moore:

Thank you for the opportunity to provide comments on the proposed Implementation Plan for Missouri's VW Trust settlement. We recognize and applaud the agency's diligence in reconciling the needs and interests of so many engaged stakeholders. The proposed Implementation Plan manages to be both comprehensive and inclusive. It represents the agency's thoughtful stewardship of the VW proceeds and the needs of Missourians.

One area that we believe could be strengthened is the plan's (unintentional) promotion of diesel bus adoptions. Limiting applications to just two buses will likely eliminate any new electric, CNG or propane adoptions due to the technical and infrastructure considerations required for these fleets. Therefore, we support allowing applications to up to 10 alternative fuel buses while keeping the maximum at two for diesel replacements.

Increasing the number of alternative fueled buses also addresses staff concerns about a potentially slow pace of funding requests. Fleets that commit to alternative fuel often phase in this investment over three or more years. Allowing larger numbers of buses will permit this approach. It also generates greater NOx reduction by stimulating the use of cleaner vehicles faster. In our view, getting more clean buses on the road today, rather than over a decade, accelerates the goal of reduced NOx emissions.

We also agree with the recommendation that only diesel buses older than 2007 model years be eligible for replacement by new diesel models. This will extend funding while targeting the dirtiest buses.

Thanks again for your leadership in this important opportunity.

Best regards,

Steve Ahrens,
President, MOPERC

Feedback on Draft Implementation Guidelines

Q3 If you prefer, you can upload your comments about the draft guidelines from a separate file. File types allowed are .pdf, .doc and .docx, and image file types .png, .jpg, .jpeg, and .gif. The size limit is 16MB.

Respondent skipped this question

#14

COMPLETE

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Started: Friday, May 04, 2018 10:54:55 AM
Last Modified: Friday, May 04, 2018 10:59:16 AM
Time Spent: 00:04:21
IP Address:

Page 1

Q1 Contact Information

First Name	Patrick
Last Name	Justis
Email Address	
Affiliation	MO EV Collaborative
City	St. Louis
State	MO

Q2 The department welcomes comments about the draft Volkswagen Trust Implementation Guidelines. Please use this place to express your thoughts about the draft guidelines and offer specific improvements.

Please see uploaded document with comments from MO EV Collaborative.

Q3 If you prefer, you can upload your comments about the draft guidelines from a separate file. File types allowed are .pdf, .doc and .docx, and image file types .png, .jpg, .jpeg, and .gif. The size limit is 16MB.

MO EV Collab Comments on MDNR Draft Plan.pdf(387.9KB)

Comments on MDNR VW Settlement Draft Plan and Guidelines
Missouri EV Collaborative Comments on Category #8, EV Charging Infrastructure
May 4, 2018

The Missouri EV Collaborative (MEVC), a group of utilities and non-profits, supports MDNR's allocation of \$6.15 million to award category #8, Electric Vehicle Charging Stations. We further support MDNR's approach to first initiate a team to develop and implement a strategic plan on corridor fast charging and, secondarily, developing an application process for Level 2 charging infrastructure at workplaces and multi-family dwellings with any remaining funding.

The team approach is appropriate for this category. A team can provide well-coordinated and thoughtful development of a minimum practical network plan for corridor fast-charging. When implemented, such a plan will solve the long-distance charging barrier in an efficacious and cost-effective manner and result in accelerating the adoption of battery electric vehicles. As demonstrated through the MDNR comment period, MEVC is putting significant effort into this important area, has keen interest and knowledge about EV charging infrastructure, and would like to participate on the team. Further, MEVC is prepared to lead the team that MDNR will define (hereafter noted as "BMP EV Team") with the oversight and direction of MDNR. With regard to BMP EV Team members, MEVC recommends that MDNR include several perspectives while maintaining a manageable size and market competition. The BMP EV Team may also consider having a core Working Group focused on detailed plan development with a larger advisory team to provide input and additional oversight. Given that utilities are highly motivated to see EV infrastructure established and the fact that EV infrastructure requires utility engagement, BMP EV Team members should include all utility types in Missouri: investor owned utilities, municipal utilities, and rural cooperative utilities. Additional members should be included or invited to participate, as shown in the following table:

Organization	Number	Role
MDNR – APCP	1 or 2	Oversight and direction
MDED – Division of Energy	1	Consulting on state policy and
Citizen EV Advocates	2	Input and feedback based on EV ownership experience
Investor Owned Utilities	2 or 3	Leadership of Working Group and plan development as well as potential implementation management.
Municipal Utilities	2 or 3	Working Group and coordination with municipalities as well as potential implementation management.
Cooperative Utilities	2 or 3	Working group and coordination with municipalities as well as potential implementation management.
Environmental Advocacy Org	1	Coordination of environmental advocacy input and feedback
Clean Cities - KC	1	Consulting input and Working Group
TOTAL	14-19	BMP EV Team of 14-19; Working Group of 7-10.
Charging Station Vendors	open	Consulting input to BMP EV Team and Working Group

An additional participating group could be automakers, but it may be difficult to have consistent involvement from them. Note that while charging station vendors will be able to provide valuable input regarding equipment, locations, and user interface, competitive considerations may warrant that they are not official members of either the BMP VW Team or the Working Group. We expect that there may be others that will want to provide input or that should be engaged for input or coordination and the process should accommodate these inputs and coordination, but the team must have a limited size to be effective. The overall BMP VW Team should be managed and convened by MDNR-APCP, while the Working Group should be managed and convened by a utility representative (Pat Justis, who leads the Missouri EV Collaborative proposed draft plan to-date, is available for this role). General schedules and timeline for meetings should be determined once the BMP VW Team has convened, but it may be appropriate for the broader BMP VW Team to meet approximately quarterly, while the Working Group meets more frequently to develop the plan.

With regard to comments related to specifics in the Implementation Guidelines document, we offer the following:

- On page 46-para 1, is noted "electric vehicle level 3 (or better) fast charging stations" and that is again noted on the same page in para 5. Level 3 charging is really the highest category of charging at this time and the nomenclature for charging higher than that has not yet been developed, so it would be appropriate to remove the "level 3 (or better)" language in both cases and possibly just state "fast-charging stations that include 50kW or higher charging levels....." (In fact, SAE nomenclature considers what we commonly discuss as 50kW DC fast-charging to be "Level 2 DC" charging rather than Level 3. However, to avoid confusion most industry experts simply call all DC fast-charging, "Level 3.") Perhaps it is best to avoid the technical nomenclature confusion and focus only on the performance of equipment (i.e., including >50kW) as stated above. The Working Group should research practical options for charging levels to incorporate into a corridor plan and have EV charging station vendors provide some input to the BMP VW Team to comment on the plan. Additionally, to ensure that all EVs are able to utilize the corridor charging islands, MDNR should include Level 2 charging in the statewide fast-charging stations. There are EVs that do not take a fast charge and, while most would agree that Level 2 charging is not a practical method for charging along long-distance routes, because these islands should be located within communities, Level 2 charging would also be useful for those living in those communities. Further, it would also enable those EV owners without fast charging ports to still travel across the state, albeit with longer charge times.
- Section 2.8 includes language around a competitive "application" process. We suggest that this would be appropriate if MDNR needs to utilize the contingency plan for Level 2 charging but, for the priority effort to deploy corridor fast charging throughout Missouri, a competitive RFP process will likely be most appropriate. While an RFP process is somewhat akin to an application process, it will be much more rigorous and more complex than a traditional program application. We recommend adjusting the language to eliminate the appearance of a straightforward application process for the corridor charging islands. The process would be public and Missouri landowners will certainly have engagement by charging station developers that bid through the RFP process. We recommend that the guidelines discuss the RFP process only in general terms as yet to be developed, but with assurance of a public and competitive process to ensure appropriate costs and fairness to the competitive marketplace. Section 2.8.2

states "numerous competitive application process for the various stretches of highway corridors throughout the state." We recommend eliminating this language as well as the additional "applicant" and "application" language from this section altogether.

Thank you for considering our comments. If you have any questions or would like clarification or follow-up, please contact Pat Justis at or .

Missouri EV Collaborative Members



#15

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Friday, May 04, 2018 1:42:09 PM
Last Modified: Friday, May 04, 2018 1:45:46 PM
Time Spent: 00:03:36
IP Address:

Page 1

Q1 Contact Information

First Name	Chris
Last Name	Kraft
Email Address	
Affiliation	Spire Inc.
City	St. Louis
State	MO

Q2 The department welcomes comments about the draft Volkswagen Trust Implementation Guidelines. Please use this place to express your thoughts about the draft guidelines and offer specific improvements.

My comments for both the Draft Beneficiary Mitigation Plan and the Draft Implementation Guidelines are in a single Word document (attached).

Q3 If you prefer, you can upload your comments about the draft guidelines from a separate file. File types allowed are .pdf, .doc and .docx, and image file types .png, .jpg, .jpeg, and .gif. The size limit is 16MB.

VW Funding Comments 2018-05-04.docx (216KB)

May 4, 2018

For consideration of the MODNR Staff –

First, I would like to thank the staff of the Missouri Department of Natural Resources for their tremendous efforts on this program. There is no doubt that this funding offers a unique opportunity for the State of Missouri to reduce NOx emissions and meet other worthy objectives. The Department has successfully gathered input from various stakeholders (in state and out) and has led a very constructive, transparent, and inclusive process. Thank you all for your extraordinary efforts.

General Comments:

- I strongly support the competitive scoring formula based on Projected NOx Reductions per VW \$ spent. This ensures that the most meaningful projects are funded first and brings a competitive element to the application process. I believe this form of competition is smart and will ultimately provide Missouri with the most benefit of the primary objective, reducing NOx emissions.
- For any Competitively Scored categories, I do not see the need for varying Maximum Funding limits between different technologies (unless dictated by the consent decree). Ultimately, since these applications are competitively scored – there is already a mechanism to favor the most effective projects. These funding limits may inadvertently steer applicants to technologies that are less efficient in regards to NOx reductions because they have more funding dollars available.
- **Regarding Award Categories 4, 5, 6, and 7** – if the funds are not used in the first round, they are scheduled to immediately roll-up to Categories 1, 2, and 3. The most recent schedule suggests that some categories will be opened in Summer of 2018 and projects will be selected in Fall of 2018. Since this is such a narrow timeframe, there may be prospective respondents with worthy projects that are simply not able to submit that quickly. They may require more time to submit paper work, need to wait for fueling infrastructure, or may require additional time to assess their vehicle turnover cycles. Instead of immediately rolling these funds over to other categories, I recommend allowing a second application process for the funds to be used in the same category. The primary benefit would be to give applicants more time, if necessary, but it may be beneficial to have slight increases in Maximum Funding Available or Cost Share (where applicable).
- **Award Category #5 Locomotive and Marine.** If all the funds are not issued in the initial round, I recommend issuing a second round and removing the maximum of \$1 million per applicant. As noted, this category has potential for dramatic NOx emission reductions and I think it is smart to leave the option available to allocate all \$2 million to a single, large project.
- **Award Category #8: Electric Vehicle Charging Stations.** \$6.15 million is a considerable portion of Missouri's total allocation of VW funds. My primary concern is that the full \$6.15 million is being guaranteed up front, regardless of utilization. All the other categories have to show an actual emissions reduction. Charging infrastructure cannot significantly impact NOx reductions if it is underutilized. I recommend releasing this money in 4 waves of equal values, with a period in between each to gauge effectiveness. For example, the first wave of \$1.5 million will be issued,

followed by a trailing evaluation period (maybe 12 months, as example) with very specific targets to meet (likely kWh sales). If the targets are met, the next wave of funds will be released to this same category (and the process will continue until the funds are exhausted or the targets are missed). Without this type of tiered structure, the incentive may simply be to build the infrastructure – not necessarily to have it used and useful. Without any additional measures, we run the risk of using 15% of Missouri's VW money to fund infrastructure, without any meaningful impact to the primary objective of NOx reduction.

- **Award Category #8.** I agree with the decision to exclude Hydrogen fueling stations from this category, as they are extremely expensive and building infrastructure without any vehicles is very speculative in nature.
- The Kansas City metro area seems to be receiving a small amount of the funds at 10%. I would like to ensure that this allocation is representative of the affected vehicles that were within the KC metro area and that they are receiving a fair proportion.

Electric Vehicle Emissions Scoring:

In order to truly maximize Missouri's health and air quality benefits from these funds, I feel it is critical that we accurately score emissions associated with power generation in Missouri for Electric Vehicles and other applications.

- In the categories which are competitively scored, Electric Vehicles are allocated 25% of the emissions of a new diesel in order to compensate for their emissions related to the generation of power. After some research, I believe that this number may be far too low and it deserves a formal review.
- The following statistics are provided by the EIA regarding power generation in the State of Missouri:
 - Approximately 80% of our utility power is generated by burning coal.
 - 8 of our 10 largest power generation facilities are coal-fired plants.
 - Renewables (wind, solar, hydro), made up less than 2% of our utility power generation in 2016.
 - Renewable utility power generation (wind, solar, hydro) **decreased by 20%** between 2015 and 2016. (1.271 million MWh in 2016 vs. 1.595 million MWh in 2015).
 - Total renewable power generation (which includes utility and non-utility), makes up approximately 3% of Missouri's total power generation.
 - Total renewable power generation **decreased by 8%** between 2015 and 2016. (2.423 million MWh in 2016 vs. 2.645 million MWh in 2015).
 - While coal consumption for power generation has been decreasing nationally – **the EIA has reported an increase in coal consumption for power generation in the State of Missouri in 2017.**
 - Many states are replacing their old coal burning power plants with natural gas, which brings many advantages regarding air quality, including NOx reductions. However, **the State of Missouri actually used less natural gas for power generation in 2016 than it did in 2012.** (4.495 million MWh in 2012 vs. 4.173 million MWh in 2016).
 - **According to the EIA, only two states in the US consumed more coal for power generation in 2017.**

These funds were allocated to Missouri with the primary purpose of reducing NOx emissions and improving the air quality for residents. In our state, we produce a large majority of our electricity from

coal – which emits a considerable amount of NOx. By continued electrification, we may simply be moving NOx emissions from the tailpipe to power plants in Missouri – which is a great disservice to the Missourians that live in these areas. An initial study should be conducted that accurately accounts for the true emissions associated with power generation in Missouri. I recommend that a fair, unbiased analysis be performed to accurately estimate NOx emissions from power generation – using real numbers from Missouri from reputable sources

Using the current power generation profile, I was able to do an analysis for on-road electric vehicles, for illustrative purposes. Numbers for Missouri NOx emissions, Power Generation, etc. all publicly available through EIA's website (2016 are most recent figures made available).

MO Total Power UTL NOx Emissions	54,000	metric tons
Grams per Metric Ton	1,000,000	
MO Total Power UTL NOx Emissions	54,000,000,000	Grams
Power UTL Total Power Production	78,611,513	MWh
KWh per MWh	1,000	
Power UTL Total Power Production	78,611,513,000	KWh
MO UTL Grams of NOx per KWh	0.687	g Nox/kWh
MO Grams of Nox per MWh	686.922	g Nox/MWh
Chevy Volt Miles per kWh	3.4	Reported by OEM
Grams of Nox per Mile	0.202	
Missouri Transportation & Distribution losses	5.20%	
Grams of Nox per kWh (Adj for T&D Loss)	0.721	
Grams of Nox per Mile (Adj for T&D Loss)	0.212	

Based on my calculations – a Chevy Volt currently charging from the average power utility in Missouri would emit 0.212 grams NOx/mile. From what I have been able to find, the current [EPA vehicle standards](#) – it would seem that gasoline/diesel vehicle standards for **maximum allowable** range between 0.2 through 0.6 grams NOx/mile. What this information suggests is that driving an electric passenger vehicle in Missouri may have very similar NOx emissions to new gasoline/diesel models. In some cases, it could even emit more NOx.

Light-Duty Vehicles and Light-Duty Trucks: Clean Fuel Fleet Exhaust Emission Standards^a

	Vehicle Type	Emissions Category	Useful Life Standard	Test Weight (lbs)	NMOG (g/mi)	NOx (g/mi)	CO (g/mi)	Formaldehyde (g/mi)	PM (g/mi) ^b
	LDVs	TLEV	Intermediate	All	0.125	0.4	3.4	0.015	-
		LEV			0.075 ^c	0.2	3.4 ^c	0.015 ^c	-
		ULEV			0.040	0.2 ^c	1.7	0.008	-
		TLEV	Full		0.156	0.6	4.2	0.018	0.08
		LEV			0.090 ^c	0.3	4.2 ^c	0.018	0.08 ^c
		ULEV			0.055	0.3 ^c	2.1	0.011	0.04

According to an NREL study of a Proterra Battery Electric Bus (35' length), the bus averaged 1 mile per 2.15 kWh while operating in California. Assuming there were similar results in Missouri, the buses would average 1.631 grams of NOx/mile (2.15 kWh/mile * 0.687 grams of NOx/kWh * 1.05% loss in T&D). Based on a study I found from the [California Air Resources Board](#), the standard for new diesel transit busses less than 1 gram NOx/mile, on average. From this simple analysis, battery electric buses operating in Missouri may emit more NOx than their current diesel counterparts.

Table 1 Diesel Bus Emission Factors

(Through model year 2017)

Pollutant	Calendar Year	Model Year	Emission Factor (g/mi)	
			Average	45 MPH
ROG	2017	Entire Fleet	1.05	0.52
	2017	1973-83	1.69	0.66
	2017	1984-90	1.69	0.66
	2017	1991-93	1.67	0.40
	2017	1994-95	1.60	0.39
	2017	1996-2001	1.58	0.39
	2017	2002	1.57	0.39
	2017	2003 - 2006	1.42	0.08
	2017	2007 - 2009	0.02	0.004
	2017	2010 - 2017	0.02	0.004
	2017	2017	0.02	N/A***
CO	2017	Entire Fleet	11.75	5.52
	2017	1973-83	16.83	8.08
	2017	1984-90	15.72	7.59
	2017	1991-93	10.13	3.17
	2017	1994-95	12.55	2.12
	2017	1996-2001	13.53	1.67
	2017	2002	15.14	1.67
	2017	2003 - 2006	17.86	2.15
	2017	2007 - 2009	5.44	0.38
	2017	2010 - 2017	5.78	0.38
	2017	2017	6.28	N/A***
NOx	2017	Entire Fleet	17.65	24.83
	2017	1973-83	45.07	30.60
	2017	1984-90	41.42	28.34
	2017	1991-93	25.21	21.47
	2017	1994-95	25.88	25.13
	2017	1996-2001	24.52	25.09
	2017	2002	20.11	17.18
	2017	2003 - 2006	11.36	3.64
	2017	2007 - 2009	1.03	0.73
	2017	2010 - 2017	0.94	0.73
PM2.5 – Exhaust*	2017	Entire Fleet	0.28	0.37
	2017	1973-83	0.83	0.50
	2017	1984-90	0.81	0.49
	2017	1991-93	0.66	0.22
	2017	1994-95	0.53	0.27
	2017	1996-2001	0.35	0.22
	2017	2002	0.16	0.11
	2017	2003 - 2006	0.05	0.08
	2017	2007 - 2009	0.004	0.006
	2017	2010 - 2017	0.004	0.006
PM2.5 – Tire Wear	2017	2017	0.003	N/A***
	All Years	All Years	0.003	Not Speed-Dependent

Admittedly, the analysis is simplistic and this type of work is not necessarily my specialty. My goal is to show that further analysis needs to be completed to calculate and account for the true emissions for power generation in Missouri. After all, Missouri is the “Show Me State”. If we are going to come up with numbers for emissions related to power generation emissions, it makes sense to have an evidence-based, transparent process. Ahead of any applications being submitted, I recommend that this work be done upfront to get an estimate of these emissions by using real numbers from reliable and neutral sources – with reasonable assumptions for improvements in Missouri’s power generation in the coming decades. **Without proper analysis, we may be inadvertently using these VW funds to increase NOx emissions in Missouri or moving them to other parts of the State (which**

will affect Missourians). This number may turn out to be significantly different than the original allocation proposed by MODNR (25% of emissions of current diesel engines).

Many will point to renewable power sources such as wind and solar and natural gas as cleaner sources of power generation in the near future. While I agree that these technologies will continue to be deployed nationally and within the state, the data I was able to collect has not shown any meaningful penetration of natural gas or renewables being used for power generation in Missouri and there is no significant trends that show reduction in coal consumption in the near future. Any projections for substantial changes to our existing emissions portfolio for power generation should receive a fair level of scrutiny due to the following items:

- Renewables such as Wind and Solar have been around for decades without any significant market penetration in Missouri.
- Missouri power utilities increased their coal consumption for use in power production in 2017
- EIA data suggests Missouri power utilities decreased the amount of renewables and natural gas used for power generation between 2015 and 2016
- These numbers all indicate that power generation in the State of Missouri is simply not moving away from coal in a meaningful way.

It was also suggested during the most recent meeting that since EV's are being allocated emissions for their power generation, that vehicles powered by fossil fuels should be allocated emissions for the production of those fossil fuels. This is commonly referred to as a 'wells-to-wheels', and I do not necessarily disagree with that idea. However, I'll be quick to point out the obvious: since electricity is primarily derived from Coal in Missouri – then EV's should be allocated emissions for the production of that coal. This coal is not produced without environmental impacts and risks (like all forms of energy, including renewables). If that is the case, we may also want to consider environmental issues surrounding coal ash disposal, as well as some other major pollutants from the combustion of coal (such as mercury, CO₂, etc.) and emissions/environmental issues surrounding the mining of lithium ore, which is necessary for lithium ion batteries. This would paint a true comparison on a wells-to-wheels basis but I am not familiar with a simple tool that would incorporate all of these factors. Since MODNR has a tool they are comfortable with to calculate emissions, perhaps it is best to accept the fact that nearly all of our energy for transportation fuel (including electricity) is primarily generated by fossil fuels, all energy production has an environmental risks/costs, and just consider it a wash. This will likely minimize the administration work and costs.

One final point on emissions for electric applications. In some cases, applicants may have their own renewable, on-site power generation (such as solar) or may be purchasing offsetting renewable energy credits for their usage. While the costs for these items cannot be covered under VW funding consent decree, special consideration should be given to the scoring of their emissions. For example, if an applicant is generating their own power from solar or purchasing offsetting credits for usage in their EV – they should score more favorably than a project that uses utility power, which is predominantly powered by coal.

I truly thank the Department for the tremendous amount of time, effort, and care that has gone into this process. It has been a pleasure to participate in this process and I am open to participate further on the behalf of Spire and our many customers across the State of Missouri. I am also happy to field any follow-up questions or provide more information on any of the topics included.

Gratefully,

Chris Kraft

Spire Inc.

700 Market Street

St. Louis, MO 63101

Office

#16

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Page 1

Q1 Contact Information

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Q2 The department welcomes comments about the draft Volkswagen Trust Implementation Guidelines. Please use this place to express your thoughts about the draft guidelines and offer specific improvements.

- Regarding emissions related to the generation of electric power – use reliable third-party data to have a formal, unbiased, and transparent review of emissions associated with Missouri power generation. Without such a review, Missouri runs the risk of inadvertently using VW funds to increase NOx emissions within the state.
- Strong support for the competitive scoring formula giving preference to projects that provide the most NOx reduction per VW \$ spent.
- Allow Award Categories 4 through 7 an additional round, if there are remaining funds after the initial round.
- If the funds for Award Category #5 are not issued in the first round, have a second round that allows one party to use the entire \$2 million allocation.
- Issue the funds in Category #8 EV Charging Stations in separate tiers. After the first round is issued, additional tiers will only be released to this category if the charging equipment built from Tier 1 money hits reasonable usage targets.
- Consider allocating more funds to the Kansas City metro area, to ensure the number is representative of the affected VW vehicles registered in that area.
- Strongly agree to exclude Hydrogen fueling stations from Category #8

Q3 If you prefer, you can upload your comments about the draft guidelines from a separate file. File types allowed are .pdf, .doc and .docx, and image file types .png, .jpg, .jpeg, and .gif. The size limit is 16MB.

Respondent skipped this question

#17

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Page 1

Q1 Contact Information

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Affiliation	Missouri Department of Corrections
City	Jefferson City
State	Missouri

Feedback on Draft Implementation Guidelines

Q2 The department welcomes comments about the draft Volkswagen Trust Implementation Guidelines. Please use this place to express your thoughts about the draft guidelines and offer specific improvements.

Missouri Department of Corrections' (DOC) Comments on the Draft Beneficiary Plan and Draft Guidelines for Implementing the Plan – May 4, 2018

The Missouri State Senate has recommended an appropriation of \$1,000,000 from the Volkswagen Environmental Mitigation Trust Fund to the Missouri Department of Corrections for vehicle purchases in House Bill 2009 for FY19. This appropriation is in addition to the \$13,664,465 appropriated to the Department of Natural Resources from the fund. The Senate did not appropriate any matching funds to accompany this appropriation. Since the House did not recommend this action, it is still a conference item to be decided next week. The Senate indicated that this funding might be ongoing.

In addition, the House and Senate agreed to cut \$627,687 GR from the department's vehicle purchase appropriation and replaced it with an appropriation from the Revolving Administrative Trust Fund (RATF), which the Office of Administration has told the DOC we would not be able to access.

If this decision item is truly agreed and finally passed and not vetoed, the Department of Corrections would have direct appropriation authority against the Volkswagen Environmental Mitigation Trust Fund beginning July 1, 2018. Although the DOC Fleet Manager has been in discussion with the Office of Administration, Division of General Services concerning the draft mitigation plan and the draft implementation plan, the recommendation that the DOC receive direct appropriation authority was unexpected and the DOC believes this would have a significant impact on both the draft mitigation plan and the draft implementation guidelines.

- Per discussion with the Department of Natural Resources, the DOC understands that a third of the funding could be spent in the first year. It appears that the recommended DNR appropriation is one third of the amount of funding available from the fund and that the DOC appropriation of \$1,000,000 would create a situation, where there would be excess spending authority above the amount available for use in the first year of funding.
- The DOC would expect to purchase vehicles in both Category 2 and 3 of the draft mitigation plan.
- Because of the GR cut to our vehicle purchase appropriation, the DOC is not able to provide significant matching funds to purchase vehicles.
- The DOC will work with the Office of Administration, Division of Purchasing to establish contracts or purchase vehicles through competitive bids.
- If the direct funding is approved for DOC, we would need to work with the Department of Natural Resources to ensure that our purchasing met the requirements of the consent decree including emissions requirements.
- If the funding is ongoing, this could result in additional cuts to the amounts available in Categories 2 and 3 in the out years of the program.

Therefore, the DOC believes that the draft mitigation plan and the draft implementation guidelines will need to be revised pending the outcome of the appropriation process.

Attached is a list of DOC vehicles that we believe would meet the criteria for funding from the Volkswagen Environmental Mitigation Trust Fund.

Q3 If you prefer, you can upload your comments about the draft guidelines from a separate file. File types allowed are .pdf, .doc and .docx, and image file types .png, .jpg, .jpeg, and .gif. The size limit is 16MB.

Copy of DOC Vehicles Over 14K_Potential VW 4_20_18 volkswagen.pdf(341.3KB)

AG ENC Y_N O	LICENSE	VIN	LOCATION	YEAR	LASTER METER	MAKE	MODEL	ASSIGNMENT	BODY_STYLE_D ESC	CAT_SHORT_ DESC	SUB_CAT_SHORT_ _DESC	ORG	ASSIGN DATE
931	130379M		OCC	2008	57680	BLUEBIRD	BLUEBIRD	INMATE TRANSPORTATION	OTHER	BUS	LARGE	3952	20-Mar-07
931	130205M		JCCC	2006	199873	THOMAS	BLUEBIRD	INMATE TRANSPORTATION	OTHER	BUS	LARGE	3937	01-Dec-06
931	130904M		JCCC	2006	72901	THOMAS	BLUEBIRD	INMATE TRANSPORTATION	OTHER	BUS	LARGE	3937	20-Jun-05
931	130090M		ACC	2001	71379	BLUEBIRD	BLUEBIRD	INMATE TRANSPORTATION	OTHER	BUS	LARGE	3967	31-Mar-03
931	130337M		NECC	1992	99522	BLUEBIRD	BLUEBIRD	TRAINING/FIRE RANGE- DONATED	OTHER	BUS	LARGE	3991	29-Feb-00
931	130739M		HED/CONST. UNIT	1999	71817	INTERNATIONAL	UTILITY	HEAVY EQUIPMENT	TRUCK REGULAR CAB	HEAVY DUTY TRUCK	TANDEM DUMP, 10-15 CY	4158	01-Oct-13
931	130040M		CRCW	2004	527482	INTERNATIONAL	990	WAREHOUSE	TRUCK REGULAR CAB	HEAVY DUTY TRUCK	ROAD TRACTOR, SINGLE AXLE	4152	22-Jan-04
931	130896M		ERCW	2003	529437	INTERNATIONAL	990	WAREHOUSE EASTERN REGION	TRUCK REGULAR CAB	HEAVY DUTY TRUCK	ROAD TRACTOR, SINGLE AXLE	4153	29-Feb-04
931	130548M		MVE- OFFICE SYSTEMS	2005	448200	INTERNATIONAL	9200	OFFICE SYSTEMS	TRUCK REGULAR CAB	HEAVY DUTY TRUCK	ROAD TRACTOR, SINGLE AXLE	4972	21-Dec-04
931	130847M		SECC	2001	42859	FORD	F750 TRUCK	RECYCLING PROGRAM	TRUCK REGULAR CAB	HEAVY DUTY TRUCK	ROAD TRACTOR, SINGLE AXLE	3994	14-May-01
931	130566M		MVE-WHSE& TRUCKING	2007	357799	INTERNATIONAL	9200	MVE WAREHOUSE & TRUCKING	TRUCK REGULAR CAB	HEAVY DUTY TRUCK	ROAD TRACTOR, SINGLE AXLE	4963	27-Mar-07
931	130525M		MVE-WHSE& TRUCKING	2007	301646	INTERNATIONAL	9200	WAREHOUSE	TRUCK REGULAR CAB	HEAVY DUTY TRUCK	ROAD TRACTOR, TANDEM AXLE	4963	22-Apr-09
931	130361M		NECC	1998	23622	INTERNATIONAL	4700	SNOW REMOVAL	TRUCK REGULAR CAB	HEAVY DUTY TRUCK	SINGLE AXLE DUMP, 7-10 CY	3991	24-Nov-97

AG ENC Y_N O	LICENSE	VIN	LOCATION	YEAR	LASTER METER	MAKE	MODEL	ASSIGNMENT	BODY_STYLE_D ESC	CAT_SHORT_ DESC	SUB_CAT_SHORT _DESC	ORG	ASSIGN DATE
931	130483M		CRCC	1998	24772	INTERNATIONAL	4700	MAINTENANCE	TRUCK REGULAR CAB	HEAVY DUTY TRUCK	PLATFORM DUMP	3990	01-Dec-13
931	130562M		MVE-MCC LAUNDRY	2008	575001	INTERNATIONAL	7600	LAUNDRY	TRUCK REGULAR CAB	HEAVY DUTY TRUCK	ROAD TRACTOR, SINGLE AXLE	4965	14-Jun-07
931	130551M		MVE- FCC LAUNDRY	2007	548948	INTERNATIONAL	7600	LAUNDRY	TRUCK REGULAR CAB	HEAVY DUTY TRUCK	ROAD TRACTOR, TANDEM AXLE	4951	28-Feb-07
931	130537M		MVE-CMCC TIRE RECYCLE	1990	286699	INTERNATIONAL	1700	TIRE RECYCLING	TRUCK REGULAR CAB	HEAVY DUTY TRUCK	ROAD TRACTOR, SINGLE AXLE	4948	22-Dec-89
931	130583M		MVE- CCC CLOTHING	1993	497147	INTERNATIONAL	8200	CLOTHING FACTORY	TRUCK REGULAR CAB	HEAVY DUTY TRUCK	ROAD TRACTOR, SINGLE AXLE	4941	01-Apr-14
931	130570M		MVE- MCC LAUNDRY	1990	241100	GMC	T7500	LAUNDRY	TRUCK REGULAR CAB	HEAVY DUTY TRUCK	ROAD TRACTOR, SINGLE AXLE	4965	01-Mar-09
931	130825M		ERCW	2001	63023	FREIGHTLINER	FL70	WAREHOUSE EASTERN REGION	TRUCK REGULAR CAB	HEAVY DUTY TRUCK	SINGLE AXLE DUMP, 7-10 CY	4153	29-Feb-04
931	130824M		ERDCC	2001	23980	FREIGHTLINER	FL70	WAREHOUSE	TRUCK REGULAR CAB	HEAVY DUTY TRUCK	ROAD TRACTOR, SINGLE AXLE	3992	19-Sep-00
931	130804M		SCCC	2000	34950	FREIGHTLINER	FL70	MAINTENANCE	TRUCK REGULAR CAB	HEAVY DUTY TRUCK	TANDEM DUMP, 10-15 CY	3993	07-Oct-99
931	130784M		MVE- FCC LAUNDRY	1999	337788	FREIGHTLINER	FL112	LAUNDRY	TRUCK REGULAR CAB	HEAVY DUTY TRUCK	ROAD TRACTOR, SINGLE AXLE	4951	01-Dec-17
931	130726M		MVE- WHSE & TRUCKING	1998	156407	FREIGHTLINER	FL70	WAREHOUSE	TRUCK REGULAR CAB	HEAVY DUTY TRUCK	ROAD TRACTOR, SINGLE AXLE	4963	28-Jul-98
931	130254M		ACC	1998	45080	FREIGHTLINER	FL80	FACILITY MAINTENANCE	TRUCK REGULAR CAB	HEAVY DUTY TRUCK	TANDEM DUMP, 10-15 CY	3967	01-Oct-13 565

AG ENC Y_N O	LICENSE	VIN	LOCATION	YEAR	LASTER METER	MAKE	MODEL	ASSIGNMENT	BODY_STYLE_D ESC	CAT_SHORT_ DESC	SUB_CAT_SHORT _DESC	ORG	ASSIGN DATE
931	130042M		HED/CONST. UNIT	1998	46239	FREIGHTLINER	FL80	HEAVY EQUIPMENT	TRUCK REGULAR CAB	HEAVY DUTY TRUCK	TANDEM DUMP, 10-15 CY	4158	01-Oct-13
931	130809M		ERCW	2001	114808	FREIGHTLINER	FL112	WAREHOUSE EASTERN REGION	TRUCK REGULAR CAB	HEAVY DUTY TRUCK	ROAD TRACTOR, SINGLE AXLE	4153	29-Feb-04
931	130814M		HED/CONST. UNIT	2000	392855	FREIGHTLINER	FL80	HEAVY EQUIPMENT DEPOT	TRUCK REGULAR CAB	HEAVY DUTY TRUCK	ROAD TRACTOR, SINGLE AXLE	4158	20-Dec-99
931	130771M		MVE- FCC LAUNDRY	1999	707389	FREIGHTLINER	FL112	LAUNDRY	TRUCK REGULAR CAB	HEAVY DUTY TRUCK	ROAD TRACTOR, SINGLE AXLE	4951	26-Apr-99
931	130738M		HED/CONST. UNIT	1999	419584	FREIGHTLINER	FL70	HEAVY DEPOT	TRUCK REGULAR CAB	HEAVY DUTY TRUCK	ROAD TRACTOR, SINGLE AXLE	4158	01-May-09
931	130034M		HED/CONST. UNIT	1991	506692	FREIGHTLINER	FL80	HEAVY EQUIP DEPOT	TRUCK REGULAR CAB	HEAVY DUTY TRUCK	TANDEM DUMP, 10-15 CY	4158	13-Feb-02
931	130714M		MVE- WHSE & TRUCKING	1999	540483	FREIGHTLINER	FLD120	WAREHOUSE	TRUCK REGULAR CAB	HEAVY DUTY TRUCK	ROAD TRACTOR, SINGLE AXLE	4963	09-Jun-98
931	130811M		MVE- FCC LAUNDRY	2000	806429	FREIGHTLINER	FLD120	LAUNDRY	TRUCK REGULAR CAB	HEAVY DUTY TRUCK	ROAD TRACTOR, SINGLE AXLE	4951	02-Dec-17
931	130806M		MVE- WHSE & TRUCKING	2000	594379	FREIGHTLINER	FL60	WAREHOUSE	TRUCK REGULAR CAB	HEAVY DUTY TRUCK	ROAD TRACTOR, SINGLE AXLE	4963	01-Jan-10
931	130812M		MVE- CMCC TIRE RECYCLE	2000	565643	FREIGHTLINER	FLD120	TIRE RECYCLING	TRUCK REGULAR CAB	HEAVY DUTY TRUCK	ROAD TRACTOR, SINGLE AXLE	4948	30-Nov-99
931	130716M		MVE- WHSE & TRUCKING	1999	588963	FREIGHTLINER	FL70	WAREHOUSE	TRUCK REGULAR CAB	HEAVY DUTY TRUCK	ROAD TRACTOR, SINGLE AXLE	4963	09-Jun-98
931	130715M		MVE- WHSE & TRUCKING	1999	686691	FREIGHTLINER	FL70	WAREHOUSE	TRUCK REGULAR CAB	HEAVY DUTY TRUCK	ROAD TRACTOR, SINGLE AXLE	4963	09-Jun-98 566

AG ENC Y_N O	LICENSE	VIN	LOCATION	YEAR	LASTER METER	MAKE	MODEL	ASSIGNMENT	BODY_STYLE_D ESC	CAT_SHORT_ DESC	SUB_CAT_SHORT _DESC	ORG	ASSIGN DATE
931	130595M			1996	397535	FREIGHTLINER	FL70	LAUNDRY	TRUCK REGULAR CAB	HEAVY DUTY TRUCK	ROAD TRACTOR, SINGLE AXLE	4965	11-Sep-96
931	130596M		MVE- MCC LAUNDRY	1996	592768	FREIGHTLINER	FL70	LAUNDRY	TRUCK REGULAR CAB	HEAVY DUTY TRUCK	ROAD TRACTOR, SINGLE AXLE	4965	11-Sep-96
931	130818M		CRCW	2000	493626	FREIGHTLINER	FL80	WAREHOUSE	TRUCK REGULAR CAB	HEAVY DUTY TRUCK	SINGLE AXLE DUMP, 7-10 CY	4152	01-Jun-12
931	130572M		MVE- CMCC TIRE RECYCLE	1995	470659	FREIGHTLINER	FLD120	TIRE RECYCLING	TRUCK REGULAR CAB	HEAVY DUTY TRUCK	ROAD TRACTOR, SINGLE AXLE	4948	14-Jun-95
931	130881M		MVE- WHSE & TRUCKING	2003	360417	FREIGHTLINER	FL70	WAREHOUSE	TRUCK REGULAR CAB	HEAVY DUTY TRUCK	ROAD TRACTOR, SINGLE AXLE	4963	29-Oct-02
931	131025M		HED/CONST. UNIT	1996	39929	FORD	CONVENTION AL H AT9513	HEAVY EQUIPMENT	OTHER	HEAVY DUTY TRUCK	TANDEM DUMP, 10-15 CY	4158	01-Oct-13
931	130153M		CRCC	1997	66288	FORD	F600	MAINTENANCE	TRUCK REGULAR CAB	HEAVY DUTY TRUCK	ROAD TRACTOR, SINGLE AXLE	3990	21-Aug-96
931	130541M		MVE- WHSE & TRUCKING	1994	58228	FORD	F700	WAREHOUSE	TRUCK REGULAR CAB	HEAVY DUTY TRUCK	ROAD TRACTOR, SINGLE AXLE	4963	24-Sep-93
931	130538M		MVE- WHSE & TRUCKING	1994	63154	FORD	F700	WAREHOUSE	TRUCK REGULAR CAB	HEAVY DUTY TRUCK	ROAD TRACTOR, SINGLE AXLE	4963	23-Sep-93
931	130827M		ERDCC	2000	16254	FORD	F550	MAINTENANCE	TRUCK REGULAR CAB	HEAVY DUTY TRUCK	ROAD TRACTOR, SINGLE AXLE	3992	31-May-00
931	130826M		ERDCC	2000	10286	FORD	F550	MAINTENANCE	TRUCK REGULAR CAB	HEAVY DUTY TRUCK	ROAD TRACTOR, SINGLE AXLE	3992	31-May-00
931	131020M		HED/CONST. UNIT	2008	159871	FORD	F450	HEAVY EQUIPMENT	TRUCK CREW CAB	MEDIUM DUTY TRUCK	HEAVY DUTY PICKUP, 1 TON	4158	01-Oct-13 567

AG ENC Y_N O	LICENSE	VIN	LOCATION	YEAR	LASTER METER	MAKE	MODEL	ASSIGNMENT	BODY_STYLE_D ESC	CAT_SHORT_ DESC	SUB_CAT_SHORT _DESC	ORG	ASSIGN DATE
931	130585M		MVE- OFFICE SYSTEMS	2008	142141	INTERNATIONAL	4300	OFFICE SYSTEMS	OTHER	MEDIUM DUTY TRUCK	BOX TRUCK	4972	22-Oct-09
931	130028M		MCC	1999	258982	FORD	F450	MAINTENANCE	TRUCK REGULAR CAB	MEDIUM DUTY TRUCK	FLATBED 1.5 - 2 TON	3962	01-Aug-16
931	130371M		TCC	2010	139187	INTERNATIONAL	SCHOOL BUS	INMATE TRANSPORTATION	OTHER	BUS	LARGE	3957	8/1/2015

ACQ DATE	STA TUS _CO DE	INVENTOR Y_NO	PRIMARY_ CONTACT	VEH_CAT_ CODE	ASSIGN_Z IP_CODE	ASSIGN_ ZIP_COD E_EX	ASSIGN_CI TY_NAME	CAFE_ RATIN G	DRIVE_ TYPE_D ESC	ENGINE_SI ZE	SUB_ CAT_ COD E	FUEL_CONFI G_DESC	GVWR	FYTD FY 18 Accrued Miles as of 03/31/18	
20-Mar-07	02	0244177	2117	05	65652		FORDLAND	0	4X2	6	03	DEDDSL	31000	886	
30-Nov-06	02	0243338	1777	05	65102		JEFFERSON CITY	0	6X4	6	03	DEDDSL	36200	2505	Surplused?
20-Jun-05	02	243337	1777	05	65102		JEFFERSON CITY	0	6X4	6	03	DEDDSL	36200	890	
31-Mar-03	02	0239996	1173	05	65102		JEFFERSON CITY	0	4X2	8	03	DEDDSL	26001	1278	
29-Feb-00	02	0234620	1864	05	63334		BOWLING GREEN	0	4X2	8	03	DEDDSL	26001	70	
30-Sep-13	02	0215278	2136	08	65102		JEFFERSON CITY	0	4X2	6	09	DEDDSL	26000	303	
22-Jan-04	02	0240778	2026	08	65102		JEFFERSON CITY	0	6X4	6	05	DEDDSL	52000	25191	
29-Feb-04	02	0239981	1314	08	63628		BONNE TERRE	0	4X4	6	05	DEDDSL	52000	27704	
21-Dec-04	02	WC015758	1881	08	63334		BOWLING GREEN	0	6X4	6	05	DEDDSL	26001	23011	
14-May-01	02	0238418	2126	08	63834		CHARLEST ON	0	4X2	8	05	DEDDSL	26001	609	
27-Mar-07	02	0W16738	1881	08	65102		JEFFERSON CITY	0	6X4	6	05	DEDDSL	52000	23163	
22-Apr-09	02	017196	1881	08	65102		JEFFERSON CITY	0	6X4	6	06	DEDDSL	52000	27507	
24-Nov-97	02	0197167	1864	08	63334		BOWLING GREEN	0	4X2	6	07	DEDDSL	26001	368	

ACQ DATE	STA TUS _CO DE	INVENTOR Y_NO	PRIMARY_ CONTACT	VEH_CAT_ CODE	ASSIGN_Z IP_CODE	ASSIGN_ ZIP_COD E_EX	ASSIGN_CI TY_NAME	CAFE_ RATING	DRIVE_ TYPE_D ESC	ENGINE_SI ZE	SUB_ CAT_ COD E	FUEL_CONFI G_DESC	GVWR	FYTD FY 18 Accrued Miles as of 03/31/18	
30-Nov-13	02	0197166	1484	08	64429		CAMERON	0	4X2	8	04	DEDDSL	31000	104	
14-Jun-07	02	016866	1043	08	65270		MOBERLY	0	6X4	6	05	DEDDSL	52000	34737	
28-Feb-07	02	WO16628	1043	08	63640		FARMINGT ON	0	6X4	6	06	DEDDSL	52000	33704	
22-Dec-89	02	W007017	2092	08	65102		JEFFERSON CITY	0	4X2	6	05	DEDDSL	26001	5	Surplused?
31-Mar-14	02	W007956	1043	08	64601		CHILLICOT HE	0	4X2	6	05	DEDDSL	26001	3263	
28-Feb-09	02	W007105	1043	08	65270		MOBERLY	0	4X2	8	05	DEDDSL	26001	770	
29-Feb-04	02	0237276	1314	08	63628		BONNE TERRE	0	4X4	8	07	DEDDSL	26001	1077	
19-May-00	02	0237275	2043	08	63628		BONNE TERRE	0	4X4	8	05	DEDDSL	29650	377	
07-Oct-99	02	0229803	0898	08	65542		LICKING	0	4X2	6	09	DEDDSL	26001	52	
30-Nov-17	02	W012992	1043	08	63640		FARMINGT ON	0	4X2	8	05	DEDDSL	26001	1484	
28-Jul-98	02	W012332	1881	08	65102		JEFFERSON CITY	0	4X2	8	05	DEDDSL	26001	4168	
30-Sep-13	02	0197169	1173	08	65102		JEFFERSON CITY	0	4X4	6	09	DEDDSL	26001	236	

ACQ DATE	STA TUS _CO DE	INVENTOR Y_NO	PRIMARY_ CONTACT	VEH_CAT_ CODE	ASSIGN_Z IP_CODE	ASSIGN_ ZIP_COD E_EX	ASSIGN_CI TY_NAME	CAFE_ RATING	DRIVE_ TYPE_D ESC	ENGINE_SI ZE	SUB_ CAT_ COD E	FUEL_CONFI G_DESC	GVWR	FYTD FY 18 Accrued Miles as of 03/31/18	
30-Sep-13	02	0197168	2136	08	65102		JEFFERSON CITY	0	4X4	6	09	DEDDSL	26001	725	
29-Feb-04	02	0233979	1314	08	63628		BONNE TERRE	0	4X4	8	05	DEDDSL	26001	4708	
20-Dec-99	02	0231151	2136	08	65102		JEFFERSON CITY	0	4X4	8	05	DEDDSL	26001	11359	
26-Apr-99	02	W012495	1043	08	63640		FARMINGT ON	0	4X2	8	05	DEDDSL	26001	188	
30-Apr-09	02	0246189	2136	08	65102		JEFFERSON CITY	0	6X6	6	05	DEDDSL	26001	3655	
13-Feb-02	02	0239662	2136	08	65102		JEFFERSON CITY	0	4X2	8	09	DEDDSL	26001	1056	
09-Jun-98	02	W011796	1881	08	65102		JEFFERSON CITY	0	4X2	8	05	DEDDSL	26001	9265	
30-Nov-17	02	W012500	1043	08	63640		FARMINGT ON	0	6X6	6	05	DEDDSL	52000	11840	
31-Dec-09	02	W013508	1881	08	65102		JEFFERSON CITY	0	4X2	6	05	DEDDSL	52000	16763	
30-Nov-99	02	W012501	2092	08	65102		JEFFERSON CITY	0	6X6	6	05	DEDDSL	52000	32254	
09-Jun-98	02	W011798	1881	08	65102		JEFFERSON CITY	0	4X2	8	05	DEDDSL	26001	4183	
09-Jun-98	02	W011797	1881	08	65102		JEFFERSON CITY	0	4X2	8	05	DEDDSL	26001	25592	

ACQ DATE	STA TUS _CO DE	INVENTOR Y_NO	PRIMARY_ CONTACT	VEH_CAT_ CODE	ASSIGN_Z IP_CODE	ASSIGN_ ZIP_COD E_EX	ASSIGN_CI TY_NAME	CAFE_ RATING	DRIVE_ TYPE_D ESC	ENGINE_SI ZE	SUB_ CAT_ COD E	FUEL_CONFI G_DESC	GVWR	FYTD FY 18 Accrued Miles as of 03/31/18	
11-Sep-96	02	W010824	1043	08	65270		MOBERLY	0	4X2	8	05	DEDDSL	26001	2973	
11-Sep-96	02	W010825	1043	08	65270		MOBERLY	0	4X2	8	05	DEDDSL	26001	866	
31-May-12	02	0234729	2026	08	65102		JEFFERSON CITY	0	4X4	8	07	DEDDSL	26001	26677	
14-Jun-95	02	W009552	2092	08	65102		JEFFERSON CITY	0	4X2	6	05	DEDDSL	52000	5211	
29-Oct-02	02	W014886	1881	08	65102		JEFFERSON CITY	0	4X2	8	05	DEDDSL	26001	18196	
30-Sep-13	02	LSKDFJ	2136	08	65102		JEFFERSON CITY	0	OTHER		09	DEDDSL	52000	871	
21-Aug-96	02	0181767	1484	08	64429		CAMERON	0	4X4	8	05	DEDDSL	26001	2334	
24-Sep-93	02	W008283	1881	08	65102		JEFFERSON CITY	0	4X2	8	05	DEDDSL	26001	526	
23-Sep-93	02	W008284	1881	08	65102		JEFFERSON CITY	0	4X2	8	05	DEDDSL	26001	574	
31-May-00	02	0237333	2043	08	63628		BONNE TERRE	0	4X4	8	05	DEDDSL	26001	540	
31-May-00	02	0237334	2043	08	63628		BONNE TERRE	0	4X4	8	05	DEDDSL	26001	245	
30-Sep-13	02	0248394	2136	07	65102		JEFFERSON CITY	0	4X4		12	DEDDSL	16000	8583	

ACQ DATE	STA TUS _CO DE	INVENTOR Y_NO	PRIMARY_ CONTACT	VEH_CAT_ CODE	ASSIGN_Z IP_CODE	ASSIGN_ ZIP_COD E_EX	ASSIGN_CI TY_NAME	CAFE_ RATIN G	DRIVE_ TYPE_D ESC	ENGINE_SI ZE	SUB_ CAT_ COD E	FUEL_CONFI G_DESC	GVWR	FYTD FY 18 Accrued Miles as of 03/31/18	
22-Oct-09	02	WO17217	1881	07	63334		BOWLING GREEN	0	4X4	6	23	DEDDSL	31000	21197	
31-Jul-16	02	0225051	1861	07	65270		MOBERLY	0	4X2	8	24	DEDDSL	25999	315	
7/31/2015	02	FO15552			65081		Tipton	0	4X2	8		DEDDSL	29,800	8735	2009 Engine

#18

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Friday, May 04, 2018 3:09:42 PM
Last Modified: Friday, May 04, 2018 3:10:42 PM
Time Spent: 00:01:00
IP Address:

Page 1

Q1 Contact Information

First Name	Ewell
Last Name	Lawson
Email Address	
Affiliation	Missouri Public Utility Alliance
City	Columbia
State	MO

Feedback on Draft Implementation Guidelines

Q2 The department welcomes comments about the draft Volkswagen Trust Implementation Guidelines. Please use this place to express your thoughts about the draft guidelines and offer specific improvements.

Missouri's Draft Beneficiary Mitigation Plan and Implementation Guidelines for the Volkswagen Trust Comments from the Missouri Public Utility Alliance
May 4, 2018

Missouri cities can lower nitrous oxide emissions through the utilization of the State's \$41 million Volkswagen Trust funds. As an association of municipal utility operators, the Missouri Public Utility Alliance (MPUA or Alliance) can help foster lower emissions in community-owned fleet vehicles and facilitate a network of electric vehicle charging stations. The Alliance has represented 117 electric, water, wastewater, and gas utilities during the stakeholder meetings for mitigation and implementation plan development. There are municipal utilities in areas identified as higher pollution zones and cities with sensitive demographic populations. We support the guidelines suggested by the Missouri Department of Natural Resources (MDNR or Department) to help reduce emissions.

There are numerous types of utility and city government fleet vehicles that produce emissions from continuous, daily use. MPUA assists city utilities and city governments by identifying opportunities for funding to reduce greenhouse gas emissions. We can help identify strong candidates to achieve the goals of the MDNR's Draft Beneficiary Mitigation Plan. The Alliance supports reserving \$6 million of the trust funds for replacing government trucks to newer, lower emission models. When implementing the plan and dispersing funds, we recommend that not only miles driven be a disbursement measurement, but operational hours as a determinant, too. By virtue of how they are used, many local government and utility fleet vehicles have long operational hours but are not high mileage vehicles. High hourly operational use is also a factor in vehicle gas emissions.

Several Missouri city governments own and operate transit systems and airports. MPUA supports reserving \$4 million for transit and shuttle busses. Although there are fewer MPUA members that own airports, there is still a funding need to replace aged, high emission ground support vehicles and equipment. Many municipal entities need funding to help in the transition to more environmentally friendly vehicles.

Further, one MPUA member city, Columbia, that owns the short-line railroad from Centralia to Columbia. Railroads are an important part of Missouri's transportation network. They not only reduce highway traffic, but are also an environmentally friendly shipping method. New multi-engine genset locomotives can reduce particulate matter and nitrous oxide emissions by over 90 percent compared to older locomotives, according to the Union Pacific Railroad. Funding for a new train locomotive would help in the reduction of central Missouri emissions.

Many municipal electric utilities have invested in renewable sources for generating electricity and support the transition to electric vehicles. Even though municipal utilities are not required by state law, MPUA members have invested in wind, solar, and landfill gas produced electricity and lead the state in renewable energy development. Some communities have as much as thirty percent of renewable resources in their power portfolio. This move to renewable energy, coupled with an increasing number of electric vehicles, will go a long way toward the reduction of Missouri's nitrous oxide emissions. MPUA agrees that \$6 million be reserved for electric vehicle fast charging stations in the mitigation plan and would be happy to serve on the board deciding how to disperse the funds.

Sincerely,

Ewell Lawson
Vice President - Government Affairs, Missouri Public Utility Alliance
Chief Operating Officer, Missouri Association of Municipal Utilities

Feedback on Draft Implementation Guidelines

Q3 If you prefer, you can upload your comments about the draft guidelines from a separate file. File types allowed are .pdf, .doc and .docx, and image file types .png, .jpg, .jpeg, and .gif. The size limit is 16MB.

MPUA Comments 5.4.18 - DNR Draft Beneficiary Mitigation Plan and Implementation Guidelines - Volkswagen Trust.pdf (238.2KB)



Serving Municipal Utilities

**Missouri's Draft Beneficiary Mitigation Plan and Implementation Guidelines for the Volkswagen Trust
Comments from the Missouri Public Utility Alliance
May 4, 2018**

Missouri cities can lower nitrous oxide emissions through the utilization of the State's \$41 million Volkswagen Trust funds. As an association of municipal utility operators, the Missouri Public Utility Alliance (MPUA or Alliance) can help foster lower emissions in community-owned fleet vehicles and facilitate a network of electric vehicle charging stations. The Alliance has represented 117 electric, water, wastewater, and gas utilities during the stakeholder meetings for mitigation and implementation plan development. There are municipal utilities in areas identified as higher pollution zones and cities with sensitive demographic populations. We support the guidelines suggested by the Missouri Department of Natural Resources (MDNR or Department) to help reduce emissions.

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Sincerely,

Ewell Lawson
Vice President - Government Affairs, Missouri Public Utility Alliance
Chief Operating Officer, Missouri Association of Municipal Utilities

#19

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Friday, May 04, 2018 2:25:08 PM
Last Modified: Friday, May 04, 2018 3:45:00 PM
Time Spent: 01:19:52
IP Address:

Page 1

Q1 Contact Information

First Name	Jane
Last Name	Hinds
Email Address	
Affiliation	Columbia Water & Light
City	Columbia
State	MO

Q2 The department welcomes comments about the draft Volkswagen Trust Implementation Guidelines. Please use this place to express your thoughts about the draft guidelines and offer specific improvements.

Columbia Water & Light supports and has signed the letter from the Missouri EV Collaborative group in regard to Award Category #8 EV Charging Stations.

Page 22, Award Category 2 Government Trucks, states, "After the assumed remaining life of the existing truck, but within the 25-year life of the new truck –

- For diesel-, gasoline-, or alternative-fueled trucks: The Department will compare the EPA certified emission levels of the new truck engine to the current federal NOx tailpipe emission standard.
- For all-electric trucks: The Department will assume emission levels from the new truck are 25 percent of the current federal NOx tailpipe emission standard.

Note: The Department is using 25 percent of the tailpipe emission standard instead of assuming zero emissions to account for the emissions associated with generating the electricity needed to charge the truck."

Columbia Water & Light disagrees with adding tailpipe emissions to electric fueled vehicles to account for emissions associated with generating electricity. Diesel, gasoline, and alternative fuels such as natural gas also have emissions associated with their production, but they are not added to their tailpipe emissions in the calculations here. This calculation is then used for five of the eight award categories.

The implementation Guidelines document and table of contents has the DERA option as Award Category 7 and EV charging stations as Award Category 8; however, the Summary Table on page 11 has them reversed.

It would be good to see bonus points awarded to school buses with seat belts.

Feedback on Draft Implementation Guidelines

Q3 If you prefer, you can upload your comments about the draft guidelines from a separate file. File types allowed are .pdf, .doc and .docx, and image file types .png, .jpg, .jpeg, and .gif. The size limit is 16MB.

Respondent skipped this question

#20

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Friday, May 04, 2018 4:23:36 PM
Last Modified: Friday, May 04, 2018 4:27:57 PM
Time Spent: 00:04:20
IP Address:

Page 1

Q1 Contact Information

First Name	Kelly
Last Name	Gilbert
Email Address	
Affiliation	Metropolitan Energy Center
City	Kansas City
State	United States

Q2 The department welcomes comments about the draft Volkswagen Trust Implementation Guidelines. Please use this place to express your thoughts about the draft guidelines and offer specific improvements.

We generally agree with the approach to distribution of funding, selection process, contingencies and other topics. We have some specific recommendations related to diesel replacements and encouraging alternative fuel deployments, which are described in the attached documents.

Q3 If you prefer, you can upload your comments about the draft guidelines from a separate file. File types allowed are .pdf, .doc and .docx, and image file types .png, .jpg, .jpeg, and .gif. The size limit is 16MB.

KC and StL Clean Cities comments.pdf(667.3KB)

Comments for MO VW Mitigation Plan and Implementation Guidelines

Kyra Moore
Director, Air Pollution Control Program
Missouri Department of Natural Resources
PO Box 176
Jefferson City MO 65102

May 4, 2018

Dear Director Moore:

Metropolitan Energy Center, Kansas City Regional Clean Cities Coalition and St. Louis Regional Clean Cities appreciate the opportunity to submit comments on behalf of our members and stakeholders regarding the Missouri Department of Natural Resources (“MDNR”) draft mitigation plan and implementation guidelines for use of the funds available to Missouri under the Volkswagen Environmental Mitigation Trust (“EMT”).

Our overall goal is to ensure that investments made by MDNR through the EMT result in meaningful, long-term and cost-effective reductions in nitrogen oxides (“NOx”) and other polluting emissions from Missouri’s transportation sector, and that new alternative fuel projects are feasible to carry out under the program rules.

First, we would like to acknowledge the careful and thoughtful process MDNR has undergone to develop the draft plan and guidelines. Thank you. Numerous elements of the drafts are excellent, and in fact we support the Mitigation Plan as drafted. We offer the following recommendations for the Implementation Guidelines to maximize the impact of EMT funds:

- **Limit diesel for diesel replacements as proposed but increase allowances for alternative fuel projects.** The draft implementation guidelines seemingly unintentionally favor new diesel vehicles: Diesel replacement funding is at the same rate as alternative fuels in most categories, and limiting applications to just two buses will likely eliminate any new electric, CNG or propane adoptions due to the technical and infrastructure considerations required for these fleets. In other words, unless there is already an appropriate station available, no single fleet could generate large enough numbers of alternative fuel fleet vehicles and alternative fuel volume demand to justify additional investments in training or fuel station development. Specific recommendations:
 - Limit diesel replacements (and established alternative fuel fleets) as proposed in all truck and bus categories but allow up to 10 replacements per applicant for new alternative fuel projects. Fleets that commit to alternative fuel often phase in this investment over three or more years. Allowing larger numbers of AFV will permit this approach. It also generates greater NOx reduction by stimulating the use of cleaner engines faster.



- Allow for diesel replacements only on older vehicles (MY2002 or earlier).
- Require all diesel engines purchased—for replacement or repower, for mobile or stationary—to be B20 compatible.
- **Set realistic equipment lifetimes for vehicle categories.** A 25-year lifetime for all trucks and buses overstates long-term benefits and is unrealistic in most cases. We suggest setting a 20-year lifetime for the government-owned school bus category and a 15-year lifetime for all other truck and bus categories. While 15 and 20 years still overstates lifetime of many fleet units, these limits are more realistic and accommodate longer ownership cycles for some government agencies.
- **Use the HDVEC emission calculator for all vehicle categories.** The most up-to-date alternative fuel emission data is incorporated into tools built and managed by Argonne National Laboratories and are updated as frequently as feasible when new data comes available. Argonne recently released a new tool¹ based on its GREET and AFLEET models, as well as on EPA’s MOVES² model. Contrary to our verbal comments at the April 20 meeting when we suggested a tailpipe-only calculation, we are now recommending use of this tool, which incorporates a well-to-wheels calculation. If electric generation and transmission emissions are to be considered in the calculation, production and transport should be considered for the other fuel options, as well.

From the HDVEC web site³: “The Heavy-Duty Vehicle Emissions Calculator (HDVEC) was developed to estimate the vehicle operation nitrogen oxide (NOx) and particulate matter (PM2.5), as well as the well-to-wheel greenhouse gas emissions (GHGs) of commercially available alternative fuel medium- and heavy-duty vehicles. This tool is ideally suited to aid fleets and decision makers compare vehicle technologies for emission reductions and consider allocation of funding.

“The tool can calculate results for 3 project types:

- Environmental Mitigation w/ Scrappage
 - New alternative fuel versus new diesel, plus additional benefit from early retirement of scrapped vehicle.
- Environmental Mitigation w/ Repower
 - Vehicle after repower versus diesel vehicle before repower.
- Clean Vehicle Replacement
 - New alternative fuel versus new diesel.

¹ The HDVEC tool was developed using the AFLEET Tool 2017, available at: <https://greet.es.anl.gov/afleet>. AFLEET Tool 2017 uses emissions data from both the EPA’s MOVES and Argonne’s GREET models.

² Acronyms: **A**lternative **F**uel Life-Cycle **E**nvironmental and **E**conomic **T**ransportation (AFLEET) Tool. **G**reenhouse gases, **R**egulated **E**missions, and **E**nergy use in **T**ransportation (GREET) fuel-cycle model. **M**otor **V**ehicle **E**mission **S**imulator (MOVES).

³ <https://afleet-web.es.anl.gov/hdv-emissions-calculator/>


“The first two are specifically for environmental mitigation projects such as those funded under the *Clean Diesel Settlement* or the *Diesel Emission Reduction Program*, while the third provides results without the scrappage benefit.”

Thank you for the opportunity to comment and for all your hard work on behalf of Missouri citizens.

Signed,



Kelly Gilbert
Executive Director, Metropolitan Energy Center
Coordinator, Kansas City Regional Clean Cities
Co-chair, Advisory Board, Kansas City Regional Clean Cities



Kevin Herdler
Executive Director, St. Louis Regional Clean Cities

Members of the 2018 Kansas City Regional Clean Cities Advisory Board



#21

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Friday, May 04, 2018 5:10:18 PM
Last Modified: Friday, May 04, 2018 5:35:51 PM
Time Spent: 00:25:32
IP Address:

Page 1

Q1 Contact Information

First Name	Paul
Last Name	Brugmann
Email Address	
Affiliation	Cummins Inc.
City	COLUMBIA
State	MO

Q2 The department welcomes comments about the draft Volkswagen Trust Implementation Guidelines. Please use this place to express your thoughts about the draft guidelines and offer specific improvements.

Overall, this is a well thought out plan, with well designed 'moving parts', that should function well.

I would recommend that more consideration might be given to defining the economic need of school districts. For example, Joplin School's bus fleet is running a large portion of older emission buses due to their having to dedicate a larger amount of funding to repair their buildings after the tornado. Joplin may not meet the definition of being economically disadvantaged, but they definitely have the economic need due to their circumstances.

My other comment is that the Implementation Plan could benefit from a more comprehensive summary table. The table on page 11 is good, but if it could be expanded to include additional things like cost sharing, it would be helpful. I'm thinking of this in terms of my role, when I talk to people and want to explain the overview of the plan, if there was one table that did a good job of summarizing it all, it will be helpful to give the best possible understanding of how the plan is a benefit to them.

Q3 If you prefer, you can upload your comments about the draft guidelines from a separate file. File types allowed are .pdf, .doc and .docx, and image file types .png, .jpg, .jpeg, and .gif. The size limit is 16MB.

Respondent skipped this question

#22

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Friday, May 04, 2018 4:42:10 PM
Last Modified: Friday, May 04, 2018 6:38:00 PM
Time Spent: 01:55:49
IP Address:

Page 1

Q1 Contact Information

First Name	Lisa
Last Name	Stuecken
Email Address	
City	Jefferson City
State	MO

Q2 The department welcomes comments about the draft Volkswagen Trust Implementation Guidelines. Please use this place to express your thoughts about the draft guidelines and offer specific improvements.

couple minor edits/suggestions are attached

Q3 If you prefer, you can upload your comments about the draft guidelines from a separate file. File types allowed are .pdf, .doc and .docx, and image file types .png, .jpg, .jpeg, and .gif. The size limit is 16MB.

Draft VW Impl Guidelines-edits.docx (19.8KB)

Missouri's Draft VW Implementation Guidelines - Suggested Edits

Pg 9 Cost Share: "For example, ~~if~~ trust funds may ~~to~~ cover up to ..."

Pg 11 Summary Table: the award categories for EV and DERA options are switched (#s/descriptions mismatched)

Pg 14

- Max Award Amounts (1st bullet): "new diesel/biodiesel engine" to be consistent with pages 15 & 17
- Missouri Department of Elementary and Secondary ~~(DESE)~~ Education (DESE)
- "3-year average fund balance as of June 30th is less than 20 percent" ... 20% of what?
- "Note: ... The Department has not yet performed an analysis ..."

Pg 15

- **Nongovernment-owned Maximums Award Amounts**
- "... as defined in Section 160.400, RSMo, 2016." Commas need to be added. Not sure of the significance of adding the reference to the year.
- Last paragraph, last sentence ... "for the purposes of cost share requirements ..."

Pg 17 Round 3 & Round 5: first read seemed to imply those were the amounts of increase. Possibly "... school buses ~~increase as follows~~ increase to the following:"

Pg 21 Cost Effective Emission Reductions (1st sentence): "... in each of the ~~three~~ four pools."

Pg 22 and Pg 36 1st bullet: "... emission reductions ~~area~~ are calculated ..."

Pg 26 and Pg 30 Maximum Funding Requests: "... multiple fleets so that no single entity receives all the benefits..."

Pg 42 last sentence of first paragraph: "For every eligible school bus application received, the Department will either select it to receive funding in the first round of applications under this award category, ~~of~~ or the Department ..."

#23

COMPLETE

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Page 1

Q1 Contact Information

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Q2 The department welcomes comments about the draft Volkswagen Trust Implementation Guidelines. Please use this place to express your thoughts about the draft guidelines and offer specific improvements.

Please see attached comments.

Q3 If you prefer, you can upload your comments about the draft guidelines from a separate file. File types allowed are .pdf, .doc and .docx, and image file types .png, .jpg, .jpeg, and .gif. The size limit is 16MB.

ChargePoint MO VW Plan Comments_final.pdf(233KB)



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May 3, 2018

Kyra Moore, Director
Air Pollution Control Program
Missouri Department of Natural Resources
P.O. Box 176
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ChargePoint's Comments Regarding Missouri's Draft Beneficiary Mitigation Plan and Use of Volkswagen Settlement Funds

ChargePoint is pleased to provide written comments to the State of Missouri on the State's Draft Beneficiary Mitigation Plan, regarding the use of funds under the Environmental Mitigation Trust. The Trust funds provide a significant opportunity for the State to mitigate the environmental harm Volkswagen (VW) diesel vehicles caused, as well as advance key transportation segments that produce long-term benefits to the State and its communities. ChargePoint commends the Department of Natural Resources (herein "Department") for presenting a thorough record of decision and allowing for continued public comment and engagement on VW settlement-related matters.

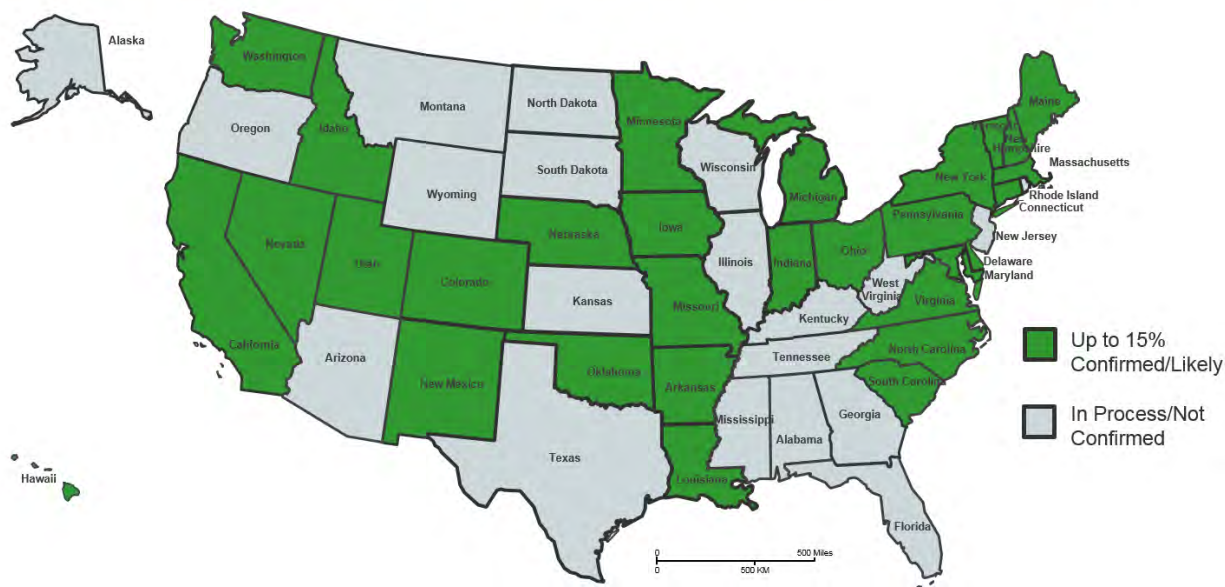
In summary, ChargePoint applauds Missouri for committing the maximum allowable allocation of Trust funds to light-duty electric vehicle infrastructure. We believe that this eligible mitigation action should remain in the final plan and throughout the subsequent phases of investment. Additionally, we strongly suggest that among other identified categories of investment, priority is given to projects involving electric transportation, including electric buses and trucks. We believe that this investment in transportation electrification significantly contributes to the NO_x mitigation goals of the Environmental Mitigation Trust, and most effectively aligns with the goals the Department outlines in the draft plan.

ChargePoint is the leading electric vehicle (EV) charging network in the world, with charging solutions for every charging need and all the places EV drivers go: at home, work, around town, and on the road. With more than 48,700 independently owned charging spots and thousands of customers nationwide, ChargePoint drivers have completed more than 36 million charging sessions, saving upwards of 36 million gallons of gasoline and driving more than 868 million gas-free miles. In addition, there are currently more than 1,500 public ChargePoint charging spots in the State of Missouri.

Support for MO's Commitment to 15% for EV Charging Infrastructure

ChargePoint strongly supports the Department's intention to commit the maximum allowable 15% for light-duty electric vehicle charging. The State's investment of just 15% will contribute to the deployment of hundreds of charging stations throughout the State. We encourage Missouri to continue to support light-duty electric vehicle charging infrastructure in the final version of the Beneficiary Mitigation Plan. We note that many states have made an investment in EV charging a core part of draft plans:

States with EVSE in Mitigation Plans



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ChargePoint supports the initial and contingency plan approach advanced in the draft plan, but we do note the high likelihood of fulfilling the 15% commitment under the initial corridor-charging program. The demand for and scale of a baseline DC fast corridor charging deployment would likely obligate the full 15%. For this reason, for the purposes of these comments, we focus on DC fast charging technology.

ChargePoint's Role on an EV Charging Advisory Committee

As the nation's leader in smart charging infrastructure deployments, ChargePoint can serve as a critical advisory party on the team to determine the State's program parameters. We currently serve in a similar capacity in Maryland and Massachusetts, where we advise State governments in formal capacities on EV charging technologies, trends, and policies. With thousands of charging spots in the State of Missouri, ChargePoint has unique, on-the-ground experience in the State, and can offer lessons learned on program design and execution.

EV Charging Program Design: Private Sites are Crucial to DC Fast Deployment

ChargePoint strongly recommends the Department maintain eligibility for funding to private sector site hosts. Private investment in charging infrastructure has supported the vast majority of our deployments and is central to the business model of EV infrastructure. Given the business models for DC fast charging, we believe that Missouri's program should be flexible to a range of business models: site host ownership, operator ownership, or a combination of the two.

In our business model, site hosts invest in, own, and operate charging infrastructure on their properties. There are many reasons why site hosts make the decision to invest in smart charging infrastructure, but a principle reason is

that infrastructure brings EV drivers onsite. For example, for a retail establishment along a corridor, attracting more drivers could mean increased revenue in a store, as EV drivers charge while shopping. Along corridors, most charging activities take place where cars can be parked for a short duration, but where other amenities exist. For this reason, restaurants, truck stops and convenience stores are among the many candidate sites for a successful deployment of DC fast charging infrastructure.

In addition, private site hosts require a higher match for funding under the program, allowing private investment to significantly decrease costs to the State and its Trust allocation. In this case, private sector funds can help to stretch the 15% commitment even farther, while remaining aligned with the State's objectives and strategies for the overall charging portfolio.

EV Charging Technology: Make Smart Technologies a Standard Qualification

ChargePoint strongly recommends that the State make smart, networked charging features a prerequisite for EV charging program funding. Smart charging infrastructure is cloud-enabled to collect and report real-time data on charging sessions, including energy use, frequency and duration of sessions, pricing, and availability to drivers. There are several reasons for incorporating only smart charging in this program:

1. Data from smart charging sessions can be used, real-time, to report NOx emissions mitigation.
2. Smart charging stations display availability to drivers and appear on maps, which helps promote driver confidence and greater utilization.
3. Charging networks allow site hosts to set pricing to drivers, which can help the business case for installation of charging assets and incentivize good charging behaviors.
4. Data from charging stations can be aggregated on any level (single station, region, state) to give the State insights into charging habits and inform transportation and grid planning.
5. Networked charging stations include remote diagnostics and "remote start" capabilities.
6. Software and firmware updates are made over the air, eliminating the need for a technician to visit site for vehicle or standards compliance updates.

None of the above functionalities are available on non-networked stations, and we believe our experience shows that networked features carry a range of benefits for states, utilities, site hosts, and drivers. In addition, we believe that all of the above functionalities should be considered as baseline eligibility criteria.

EV Charging Program Design: Support for DC Fast Charging Competitive Solicitations

ChargePoint supports Missouri's intent to issue a series of competitive solicitations for DC fast charging along key corridors, as opposed to a single, statewide solicitation for all corridors. This allows the competitive market to respond to the specific demands and layouts of each corridor, leading to better siting of charging assets and better coverage for EV drivers. As noted above, accommodating a range of business models, including site host ownership of charging infrastructure, is critical to engaging the competitive market.

Light-duty electric vehicle charging infrastructure projects can align with the State's goals for the EV charging sector and complement existing infrastructure. Existing deployments in Missouri have focused around key municipalities and areas of higher density, but there are gaps to address in order to promote broader EV adoption in all communities. The Department should determine that a funding program be designed to target areas that will

drive the greatest near- and long-term utilization of charging assets. Focusing on utilization will significantly contribute to the success of the State's deployment.

Large coordinated deployments require more labor for project management, utility coordination, and installation. DC fast charging corridors that require optimal spacing between locations, easy access from the highway, and robust operations and maintenance plans are one example. Additionally, the program can be structured to concentrate on local emissions reductions and prioritize specific non-attainment zones.

Moving forward, we recommend the State set baseline eligibility criteria for stations supported by Trust funding, including requirements for smart functionalities, standard port connectors, minimum five years of operation guaranteed, and ongoing maintenance agreement. These criteria will help shape the Advisory Committee considerations as they suggest a more thorough plan for competitive solicitations.

Remaining 85% of Funds: Priority for Electrification Technologies

Beyond the 15% allocation to EV charging infrastructure, ChargePoint encourages the State to allot a significant portion of the remaining 85% to electric fuel project categories over other fuel types, which will lead to long-term transportation emissions reductions and increased efficiency.

Under the terms of the Environmental Mitigation Trust, funds used for transportation electrification projects in multiple categories may cover the cost of the vehicle/engine and associated charging infrastructure. ChargePoint notes that many of these technologies utilize a standard connector, which can increase economies of scale as the State procures supporting charging infrastructure across eligible project types. For example, investing in electric models and associated infrastructure could enable public light-duty charging stations to be utilized for bus charging and other fleet needs. In addition, across applications in the same category. Shuttle bus electrification could support regional, municipal, and school bus fleets.

Conclusion

Thank you for your continued public engagement and consideration of our comments. ChargePoint looks forward to continuing to be a resource to the State of Missouri as it designs a program to bring the benefits of electrification to communities across the State.

Sincerely,

A handwritten signature in black ink, appearing to read 'David Schatz', with a stylized flourish at the end.

David Schatz
Director, Public Policy
ChargePoint